

PETITION FOR SPECIAL HEARING

TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY:

I, or we, Thomas L. Peddy, legal owner(s) of the property situate in Baltimore County and which is described in the description and plat attached hereto and made a part hereof, hereby petition for a Special Hearing Under Section 400.7 of the Zoning Regulations of Baltimore County, to determine whether or not the Zoning Commissioner and/or Deputy Zoning Commissioner should approve the Permit for business parking in a residential zone pursuant to Section 400.3 of the Baltimore County Zoning Regulations. The purpose of the Permit is to allow parking of automobiles by those using the proposed commercial facilities. The area for which parking is requested is, in part, adjacent to an existing parking facility in a residential zone for the use of customers using existing adjacent commercial facilities.

Property is to be posted and advertised as prescribed by Zoning Regulations. I, or we, agree to pay expenses of above Special Hearing advertising, posting, etc., upon filing of this petition, and further agree to and are to be bound by the zoning regulations and restrictions of Baltimore County adopted pursuant to the Zoning Law for Baltimore County.

Thomas L. Peddy
Contract Purchaser
Leroy Peddy
Address: Falls & Valley Roads
Lutherville, Md. 21093
823-8400
Protestant's Attorney
William A. Phipps
Address: 409 Washington Avenue, Suite 314
Towson, Maryland 21204 296-6777

ORDERED by the Zoning Commissioner of Baltimore County, this 10th day of April, 1978, that the subject matter of this petition be advertised, as required by the Zoning Law of Baltimore County, in two newspapers of general circulation throughout Baltimore County, that property be posted, and that the public hearing be held before the Zoning Commissioner of Baltimore County in Room 106, County Office Building in Towson, Baltimore County, on the 17th day of May, 1978, at 10:00 o'clock A.M.

Eric R. Thomas
Zoning Commissioner of Baltimore County

(over)

BALTIMORE COUNTY

ZONING PLANS

ADVISORY COMMITTEE



PETITION AND SITE PLAN

EVALUATION COMMENTS

BALTIMORE COUNTY ZONING PLANS ADVISORY COMMITTEE

June 1, 1978

COUNTY OFFICE BUILDING
106 Washington Avenue
Towson, Maryland 21204

Nicholas B. Commodari,
Chairman

MEMBER ADMINISTRATION
HEALTH DEPARTMENT
FIRE PROTECTION
DEPARTMENT OF TRANSPORTATION
GENE SPURLOCK
BUREAU OF PLANNING
BUREAU OF ENGINEERING
PUBLIC AND DEVELOPMENT PLANNING
DEPARTMENT OF EDUCATION
OFFICE OF THE BALTIMORE POST-PAID

W. Lee Thomas, Esquire
409 Washington Avenue
Suite 314
Towson, Maryland 21204

RE: Special hearing
Item Number 294
Petitioner - Leroy and Thomas Peddy

Dear Mr. Thomas:

The Zoning Plans Advisory Committee has reviewed the plans submitted with the above referenced petition and has made an on site field inspection of the property. The following comments are a result of this review and inspection. These comments are not intended to indicate the appropriateness of the zoning action requested, but to assure that all parties are made aware of plans or problems with regard to the development plans that may have a bearing on this case. The Director of Planning may file a written report with the Zoning Commissioner with recommendations as to the suitability of the requested zoning.

The subject of this petition is a vacant parcel of land, zoned R.C.5 and D.R.2 and is part of a larger tract zoned R.R.1 improved with a detached dwelling and proposed to be developed with a 3-story retail/office building, bank and parking area. This property abuts other lands owned by your client which have been the subjects of previous zoning hearings. For the Greenspring Racquet Club and an existing office building along Falls Road. To the east and immediately abutting this parcel is a golf driving range and individual dwelling, while a restaurant, retail store (owned by your client) and vacant land, all zoned R.R.1, abut the remainder of this property.

A review of the submitted site plan and aerial photo indicates that the existing dwelling to the east of this parcel and north of the driving range is within 300 feet of the proposed parking area. In accordance with Section 1801.1B, of the Baltimore County Zoning Regulations, parking to support the proposed commercial use is not permitted within this transition area. Therefore, revised site plans indicating the existing house and 300 feet dimension, all notes included in Section 400.4 answered in the Affirmative and an overall site plan, indicating your client's entire holdings, must be submitted prior to the scheduled hearing.

W. Lee Thomas, Esquire
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June 1, 1978

This petition is accepted for filing on the date of the enclosed filing certificate. Notice of the hearing date and time, which will be held not less than 30 nor more than 90 days after the date on the filing certificate, will be forwarded to you in the near future.

VERY TRULY YOURS,

Nicholas B. Commodari
NICHOLAS B. COMMODARI
Chairman
Zoning Plans Advisory Committee

NBCismw

cc: Kiddle Consultants, Inc.
1020 Cromwell Bridge Road
Baltimore, Maryland 21204

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: George A. Deiter, P.E.
FROM: Ellsworth S. Liver, P.E.
SUBJECT: Greenspring Square
409 Jones Road, Falls Road
District 503

REMARKS OF ENGINEERING COMMENTS:

The site plan for the subject site, dated April 6, 1978, has been reviewed by the Development Design Approval Section of the Bureau of Engineering and the following comments are furnished:

GENERAL COMMENTS:

Falls Road is a State Road. Any work within the State right-of-way is subject to review and approval by the State Highway Administration.

The State Highway Administration has indicated that the taking for Jones Falls Expressway extended will probably take this entire site.

REMARKS OF COMMENTS:

The State Highway Administration has indicated the old portion of Jones Road several years ago when the Jones Falls Expressway was built.

If the Developer wishes to close off Jones Road, he may do so, provided the adjacent property owner has no objection. A public hearing will be required to close this road.

If the Developer does not choose to close the old portion of Jones Road physically, he must seal all County right-of-way and construct a public road to the barricade, water combination concrete curb and gutter, and a 30-foot bituminous concrete cross-section on a 50-foot right-of-way.

The Developer's responsibilities shall be as follows with the construction to be accomplished under a County contract:

- The submission of detailed construction drawings to extend a minimum distance of 200 feet beyond the limits of the site or as may be required to establish line and grade.
- The submission of cross-sections as deemed necessary for design or construction purposes. The sections are to be taken at 50-foot intervals and are to be shown on standard cross-section paper at 1/4"=1' horizontal to 1/4"=1' vertical scale.

Item #204 (1977-1978)
Property Owner: Leroy and Thomas Peddy
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Highways (Cont'd)

The remaining or severed portion of roadway (the old Jones Road alignment), was not intended to connect, and should not connect, with Falls Road; and, in fact, had been barricaded to preclude such connection.

The Petitioner, together with adjacent property owners may initiate such action as is necessary to formally close this "roadway", subject to County utility easements therein. However, if this severed roadway is to serve as a public road, it must be improved in the future to County standards as a 30-foot closed section roadway on a 50-foot right-of-way with a standard type roadway termination. Highway right-of-way and any necessary reversible easements for slopes will be required.

The indicated roadway (to the Greenspring Racquet Club), the 40-foot road and any/all other roadways or rights-of-way are private. It is the responsibility of the Petitioner to ascertain and clarify rights therein and to initiate such action as may be necessary to abandon, formally close, relocate, widen, extend or otherwise cause modification thereof.

The entrance locations are subject to approval by the Department of Traffic Engineering, and shall be constructed in accordance with Baltimore County Standards.

Sediment Control

Development of this property through stripping, grading and stabilization could result in a sediment pollution problem, damaging private and public holdings downstream of the property. A grading permit is, therefore, necessary for all grading, including the stripping of top soil.

Drainage studies, storm water management drawings and sediment control drawings will be necessary to be reviewed and approved prior to the recording of any record plat or the issuance of any grading or building permits.

Storm Drainage

Provisions for accommodating storm water or drainage have not been indicated on the submitted plan.

Future drainage and utility easements and/or reservations will be required through this property.

In accordance with the drainage policy, the Petitioner is responsible for the total actual cost of drainage facilities required to carry the storm water run-off through the property to be developed to a suitable outlet.

Open stream drainage requires a drainage reserve or easement of sufficient width to cover the flood plain of a 100-year design storm. In fact, a minimum width of 50 feet is required.

The Petitioner must provide necessary drainage facilities (temporary or permanent) to prevent creating any nuisance or damages to adjacent properties, especially by the concentration of surface waters. Correction of any problem which may result, due to improper grading or improper installation of drainage facilities, would be the full responsibility of the Petitioner.

Item #204 (1977-1978)
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Water and Sanitary Sewers

There is a 12-inch public watermain and 8-inch public sanitary sewerage in Jones Road (Sewers 859-1377, File 3 and 871-0725 and 0726, File 1, respectively). This property is tributary to the Jones Falls Sewer System, subject to State Health Department regulations.

Very truly yours,

Ellsworth S. Liver
ELLERSWORTH S. LIVER, P.E.
Chief, Bureau of Engineering

ENDORSEMENTS

cc: J. Somers
W. Munchel
B. Shalowitz

S-24 Key Sheet
41 35 10 & 11 Pos. Sheets
38 12 0 Digs
60 Top Map

Attachment

Baltimore County
Department of Public Works
TOWSON, MARYLAND 21204

THOMAS M. MOURING, P.E.
DIRECTOR

May 17, 1978

Mr. S. Eric Dillman
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Re: Item #204 (1977-1978)
Property Owner: Leroy and Thomas Peddy
NED Jones Rd. 300' S.W. 1/4 Sec. 16
Existing Zoning: D.R. 2 and R.C. 5
Proposed Zoning: Special hearing for offstreet parking in a residential zone. Parking lot for adjacent commercial and office development.
Area: 1.5 District 503

Dear Mr. Dillman:

The following comments are furnished in regard to the plat submitted to this office for review by the Zoning Advisory Committee in connection with the subject item.

General

Bureau of Engineering comments were furnished the Bureau of Public Services August 28, 1973 for a portion of this site in connection with the Commercial Preliminary Site Plan for "Greenspring Square". Comments were also supplied in connection with this property for Projects IDCA No. 77-64X and No. 78-1462. Those comments are referred to for your consideration.

This property may be subject to review by the Joint Subdivision Planning Committee. The northernmost portion of this site, as indicated, consists of a Baltimore gas and electric Company Transmission Line Right-of-Way.

Highways

State (Md. 25), and any Jones Falls Expressway (I-83) future extension are state roads; therefore, all improvements, intersections, entrances and drainage requirements may affect these roads come under the jurisdiction of the Maryland State Highway Administration. Any utility construction within the state road right-of-way will be subject to the standards, specifications and approval of the State in addition to those of Baltimore County.

Jones Road, an existing public road which was recently realigned and connected to Falls Road, is proposed to be improved in the future as a 40-foot closed section roadway on a 60-foot right-of-way. Highway right-of-way widening, including any necessary reversible easements for slopes, will be required.

WATER CONNECTIONS (Cont'd)

- a. The preparation of the right-of-way plat, and the dedication of any widening and slope easements at no cost to the County.
 - d. The preparation of the right-of-way plat for any offsite road right-of-way required to make the necessary improvements. Baltimore County will attempt to acquire the right-of-way.
 - e. The grading of the widening to the proposed cross-section based on the grade of the existing road. Where adjacent properties are adversely affected by the improvements, the Developer shall be financially responsible for the necessary repairs to these properties.
 - f. The construction of combination curb and gutter in its ultimate location and a maximum curb/foot of paving adjacent thereto along the frontage of the property.
 - g. The relocation of any utilities or poles as required by the road improvements.
- No entrance will be permitted from this site to Falls Road. Therefore, the existing by-pass around the barricade must be closed off with a continuous curb as described by the Department of Traffic Engineering.

The entrance locations are subject to approval by the Department of Traffic Engineering.

Entrances shall be a minimum of 14 feet and a maximum of 30 feet wide, shall have 12-foot minimum right-of-way return, shall be located a minimum of 15 feet from any property line, and shall be constructed in accordance with Baltimore County Standards (Article 1-3-3, 8-33A and 8-33B, 1971 Edition), as the Developer's total responsibility.

Prior to removal of any existing curb for entrance, the Developer shall obtain a permit from the Bureau of Public Services, Licensing Mr. J. B. Brown, 400-3321.

The Developer shall be responsible for construction set-out of any highway improvements required in connection with this site and all state-outs shall be in accordance with Baltimore County Standards.

It shall be the responsibility of the Developer's engineer to clarify all rights-of-way within the property and to indicate such action that may be necessary to abandon, widen or extend said right-of-way. The Developer shall be responsible for the extension of all necessary plat and for all easements and/or abandonment of those rights-of-way.

Sidewalks are required on all public roads adjacent to this site. The walks shall be 5 feet wide and shall be installed to conform with Baltimore County Standards (Article 1-3-3) which places the back edge of the sidewalk 2 feet off the property line.

STORM DRAIN CONNECTIONS

In accordance with County policy, the Developer is responsible for the total actual cost of drainage facilities required to carry the storm water runoff through the property to be developed to a suitable outfall. The Developer's total responsibility includes the acquisition of easements and right-of-way - both on-site and off-site - including the entire in fee to the County of the right-of-way. Preparation of all construction, right-of-way and easement drawings including engineering and surveying, and payment of all actual construction costs including the County overhead both within and outside the development, are also the responsibility of the Developer.

Construction drawings are required for offsite drainage facilities and any on-site facilities covering offsite areas. The plans are to be designed in accordance with Baltimore County Standards and Specifications, and the drawings submitted for review and approval by the Baltimore County Bureau of Engineering. Construction is to be accomplished under a County contract and inspection.

On-site drainage facilities serving only areas within the site do not require construction under a County contract. Such facilities are considered private. Therefore, construction and maintenance shall be the Developer's responsibility. However, a drainage area may, under M-2000, including all facilities and drainage areas involved, shall be shown on a plan and submitted to Baltimore County for review.

The Developer must provide necessary drainage facilities (temporary or permanent) to prevent erosion or damage to adjacent properties, especially by the concentration of surface waters. Correction of any problem which may result, due to improper grading or improper installation of drainage facilities, would be the responsibility of the Developer.

A grading plan is required for processing construction plans, or for building permit.

SEWERAGE CONNECTIONS

Development of this property through striping, grading and stabilization could result in a serious pollution problem, draining private and public holdings downstream of the property. A grading permit is, therefore, necessary for all grading, including the striping of top soil.

WATER CONNECTIONS

A preliminary print of this property was referred to the Baltimore City, Water Division, for review and comment in regard to adequacy of water pressure in this development. Baltimore City's comments are:

"Accumulated fire flows at the proposed site are less than 2,000 gpm @ 20 psi, and the developer should be advised of this limited fire flow."

All water within the project, not in public roads will not be maintained or serviced by the City."

WATER CONNECTIONS (Cont'd)

Public water is available to serve this property. There is an existing 12-inch water main in Joppa Road, as shown on drawing 559-3377, A-1. Permission to obtain a water connection from this existing main may be obtained from the Department of Permits and Licenses.

The Developer is entirely responsible for the construction, and the cost of the construction and maintenance of the entire water service system. He is responsible for all accompanying right-of-way acquisition costs.

The Developer is responsible for the cost of supplying any existing water main connection not used to serve the proposed buildings.

This property is subject to a Water System Connection Charge based on the size of water main utilized. The total Water System Connection Charge is in addition to the normal front foot assessment and permit charges.

This Developer will be given a credit of one Water System Connection Charge for each existing water service to this site.

Fire hydrants will be required in accordance with all Baltimore County criteria, and will be the Developer's full cost responsibility.

SEWAGE TREATMENT

The Developer's engineer has indicated a proposed sewer in Joppa Road. He understands that this sewer will be built by Baltimore County, as soon as right-of-way is clear.

In addition, the State Health Department has been very hesitant about permitting any sewer connections in the Joppa Falls area until after 1975.

The Developer must prepare a schedule indicating how much sewage flow from the site is proposed to be tied into public sewers in 1975 through 1977.

The aforementioned schedule must be presented to Baltimore County. Baltimore County will then forward a plan with the necessary information to the State Health Department for approval.

It is strongly recommended that the Developer not proceed any further with his project until this approval is received.

The Baltimore County Health Department and the Director of Public Works have stated that this site cannot be developed until a satisfactory public sewage outfall is available.

In whatever manner the site is ultimately developed, the Developer is entirely responsible for the construction, and the cost of the construction and maintenance, of his on-site private sanitary sewerage, which must conform with the Baltimore County acquisition costs.

No approval is granted to include any food waste grinder among the sanitary fixtures. This is subject to further review, upon application for permission to the Department of Permits and Licenses.

SEWAGE TREATMENT (Cont'd)

When this sewerage is developed and tied into a public sewer, it will be subject to a Sanitary Sewer System Connection Charge based on the size of water main used. The total public Sanitary Sewer System Connection Charge is determined, and payable, when application for the Plumbing Permit. This charge is in addition to the normal front foot assessment and permit charges.

A Public Works Agreement must be executed by the owner and Baltimore County for any public facilities required, after which a Building Permit may be approved.

Edwin M. Oliver

EDWIN M. OLIVER, P.E.
Chief, Bureau of Engineering

EDM:EDM/DES

cc: File

April 14, 1978

Mr. S. Eric DiNenna
Zoning Commissioner
County Office Bldg.
Towson, Md. 21204
Attention: Mr. N. Commodari

Re: Z.A.C. Meeting, April 4, 1978
Item: 204
Property Owner: Leroy & Thomas Peddy
Location: NE/S Joppa Road (Rte. 25)
900' S/E of Falls Road
Existing Zoning: D.R. 2 and R.C. 5
Proposed Zoning: Special Hearing for off street parking in a residential zone
Parking lot for adjacent commercial & office development
Acre: 1.5 acres
District: 3rd

Dear Mr. DiNenna:
Development of the Peddy Property has increased considerably in recent years. In addition to the long standing Greenspring Inn, tennis courts and barns have been built. Other recent developments in the area include three office buildings, some with shops and a wine and cheese shop.

At present, the intersections of Falls Road with Joppa Road and Green Spring Valley Road operate fairly well, however, backups are frequently experienced. The development of the proposed three story office building would undoubtedly add to the traffic and could substantially lower the level of service.

CLJEM:dj

Very truly yours,
Charles Lee, Chief
Bureau of Engineering
Access Permits
By: John E. Myers

May 25, 1978

LESLIE R. GRAY
DIRECTOR

Mr. Eric S. DiNenna, Zoning Commissioner
Zoning Advisory Committee
Office of Planning and Zoning
Baltimore County Office Building
Towson, Maryland 21204

Dear Mr. DiNenna:

Comments on Item #204, Zoning Advisory Committee Meeting, April 4, 1978, are as follows:

Property Owner: Leroy and Thomas Peddy
Location: NE/S Joppa Road 900' S/E of Falls Road
Existing Zoning: D.R. 2 and R.C. 5
Proposed Zoning: Special Hearing for off-street parking in a residential zone parking lot for adjacent commercial and office development
Acre: 1.5
District: 3rd

This office has reviewed the subject petition and offers the following comments. These comments are not intended to indicate the appropriateness of the zoning in question, but are to assure that all parties are made aware of plans or problems with regard to development plans that may have a bearing on this petition.

An overall site plan of the entire Peddy holdings must be submitted to this office.

Very truly yours,

John L. Wimbley
John L. Wimbley
Planner III
Current Planning and Development

DONALD J. ROOP, M.D., M.P.H.
DEPUTY STATE AND COUNTY HEALTH OFFICER

April 27, 1978

Mr. S. Eric DiNenna
Office of Planning and Zoning
County Office Building
Towson, Maryland 21204

Dear Mr. DiNenna:

Comments on Item #204, Zoning Advisory Committee Meeting, April 4, 1978, are as follows:

Property Owner: Leroy and Thomas Peddy
Location: NE/S Joppa Road 900' S/E of Falls Road
Existing Zoning: D.R. 2 and R.C. 5
Proposed Zoning: Special Hearing for off-street parking in a residential zone parking lot for adjacent commercial & office development
Acre: 1.5
District: 3rd

Metropolitan water and sewer are available, therefore, no health hazards are anticipated.

The above property owners should have any parking area surfaced with a dustless material (bituminous or concrete surface). Any new installations of fuel burning equipment should contact the Division of Air Pollution Control, 494-3773 to obtain requirements for such installation before work begins.

Very truly yours,
Thomas H. Devlin
Thomas H. Devlin, Director
BUREAU OF ENVIRONMENTAL SERVICES

THD:MSJ:JF

STEPHEN CULLINS
DIRECTOR

April 17, 1978

Mr. S. Eric DiNenna
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Dear Mr. DiNenna:

Item No. 204 - ZAC - April 4, 1978
Property Owner: Leroy and Thomas Peddy
Location: NE/S Joppa Rd. 900' S/E of Falls Rd.
Existing Zoning: D.R. 2 and R.C. 5
Proposed Zoning: Special Hearing for off-street parking in a residential zone parking lot for adjacent commercial & office development
Acre: 1.5 Acres
District: 3rd.

Dear Mr. DiNenna:

The subject site is expected to generate approximately 100 trips per day.

Very truly yours,
C. Richard Moore
C. Richard Moore
Assistant Traffic Engineer
Planning and Design

CRN/dm

Office of Planning and Zoning
Baltimore County Office Building
Towson, Maryland 21204
Attention: N. Condonari, Chairman
Zoning Advisory Committee
Re: Property Owner: Leroy and Thomas Paddy
Location: NE/S Joppa Rd. 900' S/E of Falls Rd.
Item No. 204 Zoning Agenda Meeting of 09/04/78

- Comments:
- Pursuant to your request, the referenced property has been surveyed by the Bureau and the comments below marked with an "x" are applicable and required to be corrected or incorporated into the final plans for the property.
1. Fire hydrants for the referenced property are required and shall be located at intervals of 100 feet along an approved road in accordance with Baltimore County Standards as published by the Department of Public Works.
 2. A second means of vehicle access is required for the site.
 3. The vehicle dead end condition shown at _____ is in violation of the maximum allowed by the Fire Department.
 4. The site shall be made to comply with all applicable parts of the Fire Prevention Code prior to occupancy or beginning of operations.
 5. The building and structures existing or proposed on the site shall comply with all applicable requirements of the National Fire Protection Association Standard No. 101 "Life Safety Code", 1970 Edition prior to occupancy.
 6. Site plans are approved as drawn.
 7. The Fire Prevention Bureau has no comments, at this time.

RECOMMENDED: *[Signature]* Noted and Approved: *[Signature]*
Planning Group Fire Prevention Bureau
Special Inspection Division

an existing eight inch sewer line, running into the property, might prove inadequate for the proposed development. It was also alleged that additional paving would add appreciably to water runoff into Deep Run and the Jones Falls. It was their contention that "aesthetics" does not constitute a sufficient reason for granting the Special Hearing.

Two facts stand out sharply in this case. As stated at the outset by Counsel for the Petitioners, the sole issue is whether or not off street parking in a residential zone should be granted. Secondly, there is no question but that sufficient parking for the proposed construction can be supplied within the B.R. zoned areas of the Petitioners' property.

The Petitioners' statement that aesthetics were a major factor in presenting their Petition must be weighed against the fact that their admitted objective is the construction of a three story commercial building and a bank. The granting of the Special Hearing would facilitate these plans. It appears that aesthetics, in this instance, constitute only a tenuous support for the matter at hand.

In correspondence dated June 7, 1978, the Director of Planning stated that his office is opposed to the granting of the Special Hearing precisely because it would accelerate commercial development by making available commercially zoned land that would otherwise have to be used for parking. The Director added that he shares the concern of the State Highway Administration regarding added traffic that could be expected in the area as a result of the granting of the Special Hearing.

Without reviewing the evidence further in detail but based upon all of the evidence presented at the hearing, in the judgment of the Deputy Zoning Commissioner, the Special Hearing for off street parking in a residential zone should not be granted.

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April 16, 1978

Mr. S. Eric DiNenna, Zoning Commissioner
Office of Planning and Zoning
County Office Building
Towson, Maryland 21204

Dear Mr. DiNenna:

Comments on Item #204 Zoning Advisory Committee Meeting, April 16, 1978
are as follows:
Property Owner: Leroy and Thomas Paddy
Location: NE/S Joppa Road 900' S/E of Falls Road
District: D.R. 2 and R.C. 5
Proposed Zoning: Special Hearing for offstreet parking in a residential zone
Parking lot for adjacent commercial and office development.

Acres: 1.5 Acres
District: 3rd

The items checked below are applicable:

1. Structure shall conform to Baltimore County Building Code (B.C.B.C.) 1970 Edition and the 1971 Supplement, State of Maryland Code for the Building and other applicable codes.
2. A building permit shall be required before construction can begin.
3. Additional miscellaneous permits shall be required.
4. Building shall be upgraded to new use - requires alteration permit.
5. Three sets of construction drawings will be required to file an application for a building permit.
6. Three sets of construction drawings with a copy of Maryland Building Code and Engineer's official seal will be required to file an application for a building permit.
7. Wood frame walls are not permitted within 10' of a property line. Contact Building Department if distance is between 10' and 60' of property line.
8. Requested setback variance conflicts with the Baltimore County Building Code. See Section _____.
9. No Comment.
10. Comment: 1. One handicapped space short. Show handicapped parking signs, curb cuts and building access on plan plan.
2. Commit with Plans Review on mall requirements.

Very truly yours,
[Signature]
Charles E. Henson
Plans Review Chief

CC: []

Therefore, IT IS ORDERED by the Deputy Zoning Commissioner of Baltimore County, this 16th day of August, 1978, that the requested Special Hearing should be and the same is hereby DENIED.

[Signature]
Deputy Zoning Commissioner of Baltimore County

BOARD OF EDUCATION OF BALTIMORE COUNTY

TOWSON, MARYLAND 21204

Date: April 5, 1978

Mr. S. Eric DiNenna
Zoning Commissioner
Baltimore County Office Building
Towson, Maryland 21204

Z.A.C. Meeting of: April 4, 1978

RE: Item No. 204
Property Owner: Leroy and Thomas Paddy
Location: NE/S Joppa Road 900' S/E of Falls Road
Present Zoning: D.R. 2 and R.C. 5
Proposed Zoning: Special Hearing for offstreet parking in a residential zone Parking lot for adjacent commercial & office dev.

District: 3rd
No. Acres: 1.5 Acres

Dear Mr. DiNenna:

No hearing on student population.

Very truly yours,
[Signature]
W. Nick Petrovich
Field Representative

Wb/tp

JOSEPH M. McDONALD, PRESIDENT
T. BAYARD WILLIAMS, JR., VICE PRESIDENT
MARION M. BOSTERMAN

THOMAS M. ROVER
MRS. LORRAINE F. CONNOR
ROBERT M. BOSTERMAN

ALVIN LOROCK
MRS. HILTON M. SMITH, JR.
ROBERT W. TRACER, D.D.M.

RE: PETITION FOR SPECIAL HEARING
NE/S of Joppa Rd., 900' more or less,
SE of the intersection of Green Spring
Valley Rd. and Falls Rd., 8th District
: BEFORE THE ZONING COMMISSIONER
OF BALTIMORE COUNTY

LEROY PADDY, et al, Petitioners : Case No. 78-267-SPH

ORDER TO ENTER APPEARANCE

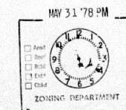
Mr. Commissioner:

Pursuant to the authority contained in Section 524.1 of the Baltimore County Charter, I hereby enter my appearance in this proceedings. You are requested to notify me of any hearing date or dates which may be now or hereafter designated therefore, and of the passage of any preliminary or final Order in connection therewith.

[Signature]
Peter Max Zimmerman
Deputy People's Counsel

[Signature]
John W. Hession, III
People's Counsel
County Office Building
Towson, Maryland 21204
494-2186

I HEREBY CERTIFY that on this 24th day of May, 1978, a copy of the foregoing Order was mailed to W. Lee Thomas, Esquire, 409 Washington Avenue, Suite 314, Towson, Maryland 21204, Attorney for Petitioners.



RE: PETITION FOR SPECIAL HEARING : BEFORE THE
NE/S of Joppa Road, approximate 900' SE of Greenspring Valley and Falls Roads - 3rd Election District : DEPUTY ZONING
Thomas L. Paddy, et al - Petitioners : COMMISSIONER
NO. 78-267-SPH (Item No. 204) : OF
BALTIMORE COUNTY

This matter comes before the Deputy Zoning Commissioner as a result of a Petition for a Special Hearing for off street parking in a residential zone. The subject property comprises a 1.52 acre parcel of land zoned R.C. 5 and D.R. 2. The parking facilities being sought would support ongoing commercial development of the Paddys' properties in the subject area.

Testimony on behalf of the Petitioners indicated that the proposed construction would take place on portions of the property presently zoned commercial and that the sole issue is the use of the residential tract for parking. Counsel for the Petitioners stated that "aesthetic reasons" were a significant factor in their desire to build the parking lot at the proposed location and that landscaping would be provided. Further testimony indicated that the commercial portions of the subject property have enjoyed commercial zoning for approximately 20 years and that the owners have the right to develop their land in a commercial manner. Counsel stated that a covenant, designed to limit commercial development beyond an agreed upon point, has been discussed with the Protestants and that, in effect, the granting of the Special Hearing would not be used as a base for building construction, other than that which is now contemplated. This covenant was proposed by Mr. Thomas L. Paddy in a letter to the Valleys Planning Council, dated June 30, 1978.

Nearby residents and others, testifying in opposition to the Special Hearing, noted that the portions of the property zoned D.R. could, in fact, be used for parking. They also feared that the impact of additional traffic would be generated by more development. Further testimony indicated that

RE: PETITION FOR SPECIAL HEARING For Off-Street Parking, NE/S of Joppa Road, Third Election District, Baltimore County, Maryland; Thomas L. Paddy, et al, Petitioners : BEFORE THE ZONING COMMISSIONER OF BALTIMORE COUNTY
NO: 78-267-SPH (Item No. 204)

NOTICE OF APPEAL

Mr. Commissioner:

Please note an Appeal to the County Board of Appeals from the Order of the Deputy Zoning Commissioner of Baltimore County on August 8, 1978.

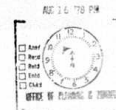
Thomas L. Paddy
Leroy Paddy, Owners
Falls and Valley Roads
Lutherville, Maryland

[Signature]
W. Lee Thomas
409 Washington Avenue
Suite 314
Towson, Maryland 21204
286-6777
Attorney for the Petitioners

CERTIFICATE OF MAILING

I HEREBY CERTIFY, that on this 16th day of August, 1978, a copy of the foregoing Notice of Appeal was mailed to John W. Hession, III, Esquire, County Office Building, Towson, Maryland 21204, Mr. Montgomery Lewis, Executive Director, The Valleys Planning Council, Inc., 212 Washington Avenue, Towson, Maryland 21204 and Mrs. Lane Berk, Berlane Farms, Lutherville, Maryland 21093.

[Signature]
W. Lee Thomas



W. LEE THOMAS, P.A.
ATTORNEY AT LAW
409 WASHINGTON AVENUE
TOWSON, MARYLAND 21204
286-6777

PETITION FOR SPECIAL HEARING
BEFORE THE
DEPUTY ZONING COMMISSIONER
NE/S of Joppa Road, Eighth
District, Leroy Paddy, Et Al.,
Petitioners: No. 78-267 EPH

BRIEF OF PETITIONERS

The Petitioners, Leroy Paddy and Thomas L. Paddy, through W. Lee Thomas, their attorney, submit the following summary of testimony and evidence and argument in support of their request for a special permit to park on that certain DNE and NCS land.

For convenience, a plat is attached outlining parcels of land germane to the issue before the Zoning Commissioner. Basically, there are five parcels numbered consecutively one through five with the first parcel and a portion of the second parcel representing the figure "7" previously referred to (land for which a parking permit has been requested). The remainder of the second parcel and the third parcel represent land presently zoned BR on which the center will be built. The fourth parcel of land is presently zoned BR and is now in commercial use for the sale of wines, liquors and fine foods. The fifth parcel is a one acre tract, zoned BR and purchased by the Petitioners in 1978 from McCaffrey.

ZONING

The BR zoning line is as indicated on the plat and borders on the east on the center line of the Baltimore Gas and Electric Company transmission line. The line extends to Joppa Road on the south, to the extension of the Jones Falls Expressway to the west and abuts the NCS zone presently used for parking purposes on the north.

The land which is zoned BR, therefore, consists of a portion of parcel one (the westernmost half of the Baltimore Gas and Electric transmission line), a portion of parcel 2, parcel 3, parcel 4 and parcel 5.

The BR commercial zoning in the mentioned parcels was first shown on Baltimore County zoning maps as follows:

Parcel	Year
Parcel 1	1955
Parcel 2	1955
Parcel 3	1955
Parcel 4 (Part)	1945 ("E" Commercial)
Parcel 4 (Part)	1955
Parcel 5 (Part)	1945 ("E" Commercial)
Parcel 5 (Part)	1955

W. LEE THOMAS, P.A.
ATTORNEY AT LAW
Suite 214
400 Washington Avenue
Towson, Maryland 21204
Area Code 410
286-0177

and other property of the Petitioners makes it clear that parking on the requested area could not have an adverse effect on the property of others.

PURPOSE OF THE REQUEST

Essentially, the Petitioners' request stems from a desire to provide on site the most attractive possible retail and office complex. By definition, this would include extensive landscaping green spaces softening the harshness of large parking areas and, where necessary, screening the parking area from public view. We can best illustrate this by exploring the differences between what we have referred to as Plan A and Plan B. Plan A is that plan submitted to the Zoning Commissioner with our request for a parking permit in the figure "7" area. Plan B, introduced as Exhibit A, represents the building plan that will be used if we are unable to use the figure "7" parking permit area. The most cursory examination of the two plans leads to the inescapable conclusion that by use of Plan A, more "greenery" is possible, more attractive and extensive screening is possible, more alleviation of the harshness of a concrete parking lot is possible and a better and more convenient public parking area is provided. Petitioners' use of Plan B, although legally permissible, would not afford these advantages. It is axiomatic that the interests of the Petitioners and the protesters coincide. The reasons for the coincidence of interests are, of course, different. The Petitioners wish to provide, at their expense, a much more attractive setting for their building and a more extensive screening and "greenery" since by so doing, their center will be more desirable for both tenants and users. The Petitioners specifically desire the use of Plan A so that the general aesthetic quality of the center will be greatly improved.

THE FEARS OF THE PROTESTANTS

It appears that a double-stranded thread of fear engulfing certain protestants has meandered throughout the testimony presented by protestants. The first strand is the fear that by some manner or method, the granting of the special permit would assist or encourage "creeping commercialism." The second strand is the fear that by some manner or method, the granting of the special permit for parking would allow more intensive use of the area presently zoned than is now possible.

The Petitioners, insofar as possible, have attempted to allay the first fear mentioned by reminding the protestants that we are not requesting reclassification which might later be used as justification for expansion of the land in the area zoned BR. We can only remind the Commissioner that the law justifying a change in zoning reclassification requires either a determination that initial error has been committed in classifying a particular tract of land or that a change in circumstances has been found which is of such magnitude as to justify and, in fact, require classification. Again, we are not

The Petitioners first acquired ownership of these parcels in the years listed:

Parcel	Year
Parcel 1	1967 (app.)
Parcel 2	1966-1969 (app.)
Parcel 3	1967 (app.)
Parcel 4	1967 (app.)
Parcel 5	1978

As can readily be seen, the BR-zoned land was purchased by the Petitioners long after it had been designated by proper governmental authorities as BR, and long after Baltimore County had decreed that the land was to be used commercially. The Petitioners did not obtain zoning reclassification of this land but, instead, BR zoning was placed on the land by Baltimore County and its appropriate departments, boards and governing bodies many years before the Petitioners acquired their interest therein.

The Petitioners have been residents and businessmen in this area for many years and, in fact, have owned the Green Spring Inn since 1956.

PLANNING

Over the years, while assembling the parcels of land owned, the Petitioners have engaged the services of numerous architects, engineers and land planners in an attempt to learn how best to develop the available land. Obviously, these studies concentrated on the land as zoned; that is, in the BR zoning classification. In many instances, the proposals by land planners and other advisors were not accepted by the Petitioners, since, in their opinion, to accept such proposals would overcover the land and would not be beneficial to the community. Until early in 1978, development of the interior tract of BR land (part of parcel 1, part of parcel 2 and all of parcel 3) was impossible since, until that time, the Petitioners did not own the one acre tract designated as parcel 5. This latter tract not only provides needed access to Joppa Road but "ties out" the BR tract. When parcel 5 became available and was acquired by the Petitioners, the planning advanced. Petitioners again engaged the services of architects, landscape engineers, engineers and other advisors to properly plan the development of the BR-zoned land. These plans, as formulated, were made known as soon as possible to all applicable Baltimore County Departments, including the Planning Staff, the Planning Board, the Department of Permits and Licenses, the Health Department, the Traffic Department, the Department of Public Works and, of course, the Office of the Zoning Commissioner. The Petitioners also made presentations to the Planning Board, the Planning Staff, the Department of Public Works and the Traffic Department. Further, application was made under the IDCA regulations. In spite of this, comment has been made in the hearing that "material" was not presented

-2-

W. LEE THOMAS, P.A.
ATTORNEY AT LAW
Suite 214
400 Washington Avenue
Towson, Maryland 21204
Area Code 410
286-0177

to the Baltimore County departments and that, therefore, they and interested citizens were deprived of the opportunity to learn of the planned project. This is not true. All plans were made available to the applicable Baltimore County departments as soon as possible. In addition, informatics, both orally and in writing, was given to every Baltimore County employee who requested the same, and, as mentioned, numerous conferences were had with the appropriate individuals considering the project. It is interesting to note, for example, that the Baltimore County Traffic Department itself suggested and "engineered" the site access to and with Joppa Road. The Traffic Department felt that the plans as presented could be improved by realigning access. After discussion, thought and consultation with Petitioners' advisors, it was felt that the suggestions of the department were correct and, therefore, the initial plans were scrapped and the suggested plans were adopted in their stead.

The only comment at the hearing concerning the desire of Baltimore County to obtain additional information was to the effect that Mr. Graef was "concerned" about the development and, specifically, about the location or placement of the planned building. Mr. Graef is a planner but he is distinctly in the minority as to his comments on placement of building inasmuch as all consultants engaged by the Petitioners as well as consultants examining the project on behalf of potential lessees disagree with Mr. Graef and state that the placement of buildings as planned and presented is the correct method. Parenthetically, we might add that Mr. Graef would much prefer that the area owned by the Petitioners be developed in conjunction with development of the acreage retained by Mr. McCaffrey (between parcels 4 and 5) and the acreage owned by Mrs. Walz (immediately north of parcel 4 and west of parcel 2). This may be a utopian planning dream but we do not own the property. It would be presumptuous, self-defeating and incomprehensible for the Petitioners to plan a project including land which we do not own and which we have no expectation of ever owning. The County has power of condemnation, we do not. Therefore, in the real world, we must and did plan on the facts as they exist and we must and did plan to use for our development only that land owned or controlled by us. Reality denies us the luxury of wishful thinking.

The Petitioners have met with Mr. Graef and others in his Department. Several suggestions have been made and, in the main, Petitioners have agreed to the suggestions by Mr. Graef.

WHAT WILL BE BUILT ON THE BR TRACT

The one-, two- and three-story building already partially constructed (parcel 4) and to be constructed has been described fully by the Petitioners and their witnesses. All parties agree that the Baltimore County parking regulations specify that 201 parking spaces are necessary to serve the existing building and the building to be constructed. There is no dispute

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as to the fact that we can place 217 parking spaces on the land now zoned BR without the necessity of additional governmental authority. In conjunction with the development to occur, there will be a "tie in" of the Petitioners' property encompassing the Green Spring Inn, an adjacent community sports complex, an existing wine and food shop and the new development. This "tie in" by interior roadways would be a vast improvement over the traffic flow direction possible prior to the Petitioners' acquisition of the one-acre lot designated as parcel 5.

THE REQUEST FOR SPECIAL PERMIT

All parties concerned must understand the nature of the request for special permit; equally, they must understand what the request is not. The request is to use land which, because of location and surrounding land uses, can be used for parking purposes without in any way disrupting the life of any area resident. The request is made so that the Petitioners and the community will be able to enjoy a more aesthetically pleasing shopping and office area by the interspersing of more "greenery" and "planting in what might otherwise be an ordinary, usual and dreary parking lot consisting of an unbroken expanse of concrete. The request is an attempt to make the project as pleasing to the eye as is the wine and food shop now located on parcel 4. The request is an attempt to use land surrounded by BR zoning or the existing parking facilities for parking purposes only. The request is not an attempt to obtain on the land zoned BR a larger facility than could otherwise be accommodated. The request is not a "foot in the door" which could be relied upon by others to obtain future area zoning reclassification. (We are not dealing with a request for zoning reclassification but, rather, with a request for a special permit for parking purposes.) The request is not an attempt to obtain permission to park on a parcel of land so that such parking could later be used to support another non-residential use.

A protestant pointed out that extensive landscaping had not yet been undertaken on several of the abutting lots developed by Petitioners; however, as Mr. Thomas Paddy testified, such landscaping of other areas was necessarily delayed until the Petitioners had completed planning for the entire area. With the Petitioners' present plans, landscaping can now begin.

EFFECT ON THE NEIGHBORHOOD

Although not technically required since this is not a special exception request, uncontested testimony has been presented to the effect that the granting of this special permit will not violate any of the special exception determinants set forth in Section 502.1 of the Baltimore County Zoning Regulations. Protestants have presented no testimony and, in fact, precious little speculation which would negate the testimony presented by Petitioners as to satisfaction of these Section 502.1 requirements. In any event, Mr. Richard Laid's testimony to the effect that the requested parking area is surrounded by BR zoned land

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County Board of Appeals Room 218 Court House

TOWSON, MARYLAND 21204

November 13, 1979

NOTICE OF POSTPONEMENT AND REASSIGNMENT

NO POSTPONEMENTS WILL BE GRANTED WITHOUT GOOD AND SUFFICIENT REASONS. REQUESTS FOR POSTPONEMENTS MUST BE IN WRITING AND IN STRICT COMPLIANCE WITH BOARD RULE 208. ABSOLUTELY NO POSTPONEMENTS WILL BE GRANTED WITHIN FIFTEEN (15) DAYS OF SCHEDULED HEARING DATE IN ACCORDANCE WITH RULE 202, COUNTY COUNCIL BILL 1108

CASE NO. 78-267-SPH

Thomas L. Paddy, et al

SPH-Off street parking in a residential zone

NE/S of Joppa Rd., approx. 100' S of Jones Falls Valley and Falls Roads

3rd District

The above case, scheduled for hearing on WEDNESDAY, NOVEMBER 20, 1979, at 10 a.m., has been POSTPONED by the Board and agreement of Counsel, and

REASSIGNED FOR:

cc: Messrs. Thomas L. & Leroy Paddy

Petitioners

W. Lee Thomas, Esq.

Counsel for Petitioners

Mrs. Judy Soer

Protestant

Mrs. Lane Berk

Mrs. Nancy Hargest

People's Counsel

John W. Hession, III, Esq.

Zoning

Mr. James E. Dyer

Zoning

Mr. William Hammond

Planning

Mr. John Seyffert

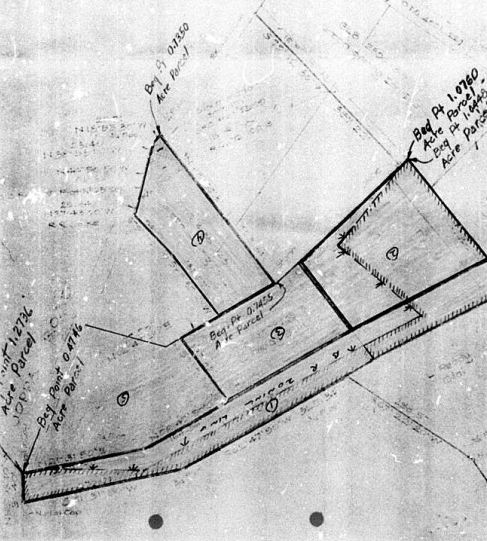
Board of Education

Mrs. Carol Breesh

County Board of Appeals

John Holman, Secretary

County Board of Appeals



7/7/78

W. Lee Thomas
Attorney for the Petitioners

-6-

W. LEE THOMAS, P.A.
ATTORNEY AT LAW
Suite 214
400 Washington Avenue
Towson, Maryland 21204
Area Code 410
286-0177

W. LEE THOMAS, P.A.
ATTORNEY AT LAW
Suite 214
400 Washington Avenue
Towson, Maryland 21204
Area Code 410
286-0177

RE: PETITION FOR SPECIAL HEARING
for Off-Street Parking in a
residential zone
NE/S of Joppa Road, approximately
900' SE of Greening Valley
and Falls Roads
3rd District
Thomas L. Peddy, et al
Petitioners

BEFORE
COUNTY BOARD OF APPEALS
OF
BALTIMORE COUNTY
No. 78-267-SPH

OPINION

This case comes before the Board on appeal from a decision of the Deputy Zoning Commissioner denying the requested off-street parking in a residential zone. The property is on the northeast side of Joppa Road, approximately 900 feet southeast of Greening Valley and Falls Roads, in the Third Election District of Baltimore County.

The Petitioner amended his request to an area of .77 acres. A copy of the description of this area is attached to this Order.

The area contained within the amended description of Petitioner's Exhibit #2 pertaining to the parking permit, which is the subject of this case, produces 81 parking spaces. Of this total, 56 spaces are being transferred from the adjacent commercial parcel shown on Petitioner's Exhibit #2. The 56 spaces to be transferred shall be subtracted from the total of 236 spaces now available and maintained on the commercial parcel as shown on Petitioner's Exhibit #2, and may be included in any calculation to fulfill parking requirements imposed on Petitioner's rental and business activities now or hereafter conducted on the commercial parcel shown on Petitioner's Exhibit #2. It is the Board's judgment that the balance of 25 spaces as shown on the parking permit site on Petitioner's Exhibit #2 shall not be included in any such calculations as a credit to fulfill parking requirements imposed on Petitioner's rental and business activities on said commercial parcel, the intent being that those additional 25 spaces shall remain as surplus spaces.

In summary, of the total of 261 spaces shown on Petitioner's Exhibit #2, only 736 may at any time be used to fulfill the parking requirements now or hereafter imposed on Petitioner's rental and business activities now or hereafter conducted on the said commercial parcel.

PETITION FOR SPECIAL HEARING *
for Off-Street Parking in a
residential zone
NE/S of Joppa Road, Eighth
District, Leroy Peddy, Et Al,
Petitioners; No. 78-267 SPH

BEFORE THE
DEPUTY ZONING COMMISSIONER
OF BALTIMORE COUNTY, MARYLAND

BRIEF OF PETITIONERS

The Petitioners, Leroy Peddy and Thomas L. Peddy, through W. Lee Thomas, their attorney, submit the following summary of testimony and evidence and argument in support of their request for a special permit to park on that certain DR2 and RC5 land.

For convenience, a plat is attached outlining parcels of land germane to the issue before the Zoning Commissioner. Basically, there are five parcels numbered consecutively one through five with the first parcel and a portion of the second parcel representing the figure "7" previously referred to (land for which a parking permit has been requested). The remainder of the second parcel and the third parcel represent land presently zoned BR on which the center will be built. The fourth parcel of land is presently zoned BR and is now in commercial use for the sale of wine, liquors and fine foods. The fifth parcel is a one acre tract, zoned BR and purchased by the Petitioners in 1978 from McCaffrey.

ZONING

The BR zoning line is as indicated on the plat and borders on the east on the center line of the Baltimore Gas and Electric Company transmission line. The line extends to Joppa Road on the south, to the extension of the Jones Falls Expressway to the west and abuts the RC5 zone presently used for parking purposes on the north.

The land which is zoned BR, therefore, consists of a portion of parcel one (the westernmost half of the Baltimore Gas and Electric transmission line), a portion of parcel 2, parcel 3, parcel 4 and parcel 5.

The BR commercial zoning on the mentioned parcels was first shown on Baltimore County zoning maps as follows:

Year	
1955	Parcel 1
1955	Parcel 2
1955	Parcel 3
1955	Parcel 4 (Part)
1955	Parcel 5 (Part)
1945	Parcel 4 (Part)
1945	Parcel 5 (Part)
1955	Parcel 5 (Part)

W. LEE THOMAS, P.A.
ATTORNEY AT LAW
JACKSON
400 WESTMINSTER AVENUE
BALTIMORE, MARYLAND 21204
JAN 20 1979
204-6777

Thomas L. Peddy, et al - #78-267-SPH

After reviewing the testimony, the Board is satisfied that the Petitioner has complied with the regulations and that the off-street parking in the residential zone shall be granted, subject to certain restrictions.

ORDER

For the reasons set forth in the foregoing Opinion, it is this 4th day of December, 1980, by the County Board of Appeals, ORDERED that the off-street parking in a residential zone petitioned for, be and the same is hereby GRANTED, subject to the following restrictions:

- The area of the parking shall be limited to .77 acres as set out in the attached description.
- The 25 parking spaces as shown on Petitioner's Exhibit #2 shall not be included in any such calculations as a credit to fulfill parking requirements imposed on Petitioner's rental and business activities on said commercial parcel, the intent being that those additional 25 spaces shall remain as surplus spaces.
- The location of landscaping and trees as shown on Petitioner's Exhibit #2 shall be placed and maintained in accordance with said plan.

Any appeal from this decision must be in accordance with Rules 8-1 thru 8-12 of the Maryland Rules of Procedure.

COUNTY BOARD OF APPEALS OF BALTIMORE COUNTY

Walter A. Brier, Jr., Chairman

Patricia Millhouse

John A. Miller

The Petitioners first acquired ownership of these parcels in the years listed:

Year	
1967 (app.)	Parcel 1
1967-1969 (app.)	Parcel 2
1967 (app.)	Parcel 3
1967 (app.)	Parcel 4
1978	Parcel 5

As can readily be seen, the BR-zoned land was purchased by the Petitioners long after it had been designated by proper governmental authorities as BR, and long after Baltimore County had decreed that the land was to be used commercially. The Petitioners did not obtain zoning reclassification of this land but, instead, BR zoning was placed on the land by Baltimore County and its appropriate departments, boards and governing bodies many years before the Petitioners acquired their interest therein.

The Petitioners have been residents and businessmen in this area for many years and, in fact, have owned the Green Spring Inn since 1936.

PLANNING

Over the years, while assembling the parcels of land owned, the Petitioners have engaged the services of numerous architects, engineers and land planners in an attempt to learn how best to develop the available land. Obviously, these studies concentrated on the land as zoned; that is, in a BR zoning classification. In many instances, the proposals by land planners and other advisors were not accepted by the Petitioners, since, in their opinion, to accept such proposals would overcloud the land and would not be beneficial to the community. Until early in 1978, development of the interior tract of BR land (part of parcel 1, part of parcel 2 and all of parcel 3) was impossible since, until that time, the Petitioners did not own the one acre tract designated as parcel 5. This "interior tract" not only provides needed access to Joppa Road but "cleans out" the BR tract. When parcel 5 became available and was acquired by the Petitioners, the planning advanced. Petitioners again engaged the services of architects, landscape engineers, engineers and other advisors to properly plan the development of the BR-zoned land. These plans, as formulated, were made known as soon as possible to all applicable Baltimore County Departments, including the Planning Staff, the Planning Board, the Department of Permits and Licenses, the Health Department, the Department of Public Works and the Traffic Department. Further, application was made under the IDCA regulations. In spite of this, however, has been made in the hearing that "material" was not presented

-2-

494-1180

County Board of Appeals

Room 218, Court House
Towson, Maryland 21204
October 8, 1979

NOTICE OF ASSIGNMENT

NO POSTPONEMENTS WILL BE GRANTED WITHOUT GOOD AND SUFFICIENT REASONS. REQUESTS FOR POSTPONEMENTS MUST BE IN WRITING AND IN STRICT COMPLIANCE WITH BOARD RULE 2(b). ABSOLUTELY NO POSTPONEMENTS WILL BE GRANTED WITHIN FIFTEEN (15) DAYS OF SCHEDULED HEARING DATE IN ACCORDANCE WITH RULE 2(b), COUNTY COUNCIL BILL 710

CASE NO. 78-267-SPH

Thomas L. Peddy et al

SPH-Off-street parking in a residential zone

NE/S of Joppa Rd., approx.
900' SE of Greening Valley
and Falls Rd.
3rd District

ASSIGNED FOR:

WEDNESDAY, NOVEMBER 28, 1979, at 10 a.m.

cc: Messrs. Thomas L. and Leroy Peddy

Petitioners

W. Lee Thomas, Esq.

Counsel for Petitioners

Mrs. Judy Boer

 Protestant || Mrs. Lane Berk | Protestant |
Mrs. Nancy Hargest	
John W. Hession, III, Esq.	People's Counsel
Mr. James E. Dyer	Zoning
Mr. William Hammond	Zoning
Mr. John Seyffert	Planning
Boards - Education	
Mrs. Carol Beresh	

Aune Holmen
County Board of Appeals

to the Baltimore County departments and that, therefore, they and interested citizens were deprived of the opportunity to learn of the planned project. This is not true. All plans were made available to the applicable Baltimore County departments as soon as possible. In addition, information, both orally and in writing, was given to every Baltimore County employee who requested the same, and, as mentioned, numerous conferences were had with the appropriate individuals considering the project. It is interesting to note, for example, that the Baltimore County Traffic Department itself suggested and "engineered" the site access to and with Joppa Road. The Traffic Department felt that the plans as presented could be improved by realigning access. After discussion, thought and consultation with Petitioners' advisors, it was felt that the suggestions of the Department were correct and, therefore, the initial plans were scrapped and the suggested plans were adopted in their stead.

The only comment at the hearing concerning the desire of Baltimore County to obtain additional information was to the effect that Mr. Graef was "concerned" about the development and, specifically, about the location or placement of the planned building. Mr. Graef is a planner but he is distinctly in the minority as to his comments or placement of building inasmuch as all consultants engaged by the Petitioners as well as consultants examining the project on behalf of potential lessees disagree with Mr. Graef and state that the placement of buildings as planned and presented is the correct method. Parenthetically, we might add that Mr. Graef would much prefer that the area owned by the Petitioners be developed in conjunction with development of the acreage retained by Mr. McCaffrey (between parcels 4 and 5) and the acreage owned by Mrs. Walcott (immediately north of parcel 4 and west of parcel 2). This may be a utopian planning dream but we do not own the property. It would be presumptuous, self-defeating and incomprehensible for the Petitioners to plan a project including land which we do not own and which we have no expectation of ever owning. The County has power of condemnation; we do not. Therefore, in the real world, we must and did plan on the facts as they exist and we must and did plan to use for our development only that land which we controlled by use. Reality denies us the luxury of wishful thinking.

The Petitioners have met with Mr. Graef and others in his Department. Several suggestions have been made and, in the main, Petitioners have agreed to the suggestions by Mr. Graef.

WHAT WILL BE BUILT ON THE BR TRACT

The one-, two- and three-story building already partially constructed (parcel 4) and to be constructed has been described fully by the Petitioners and their witnesses. All parties agree that the Baltimore County parking regulations specify that 201 parking spaces are necessary to serve the existing building and the building to be constructed. There is no dispute

-3-

W. LEE THOMAS, P.A.
ATTORNEY AT LAW
JACKSON
400 WESTMINSTER AVENUE
BALTIMORE, MARYLAND 21204
JAN 20 1979
204-6777

RE: PETITION FOR SPECIAL HEARING FOR OFF-STREET PARKING, NE/S of Joppa Road, Third Election District, Baltimore County, Maryland; Thomas L. Peddy, et al, Petitioners; No. 78-267-SPH (Item No. 204)

ZONING COMMISSIONER
OF
BALTIMORE COUNTY

NOTICE OF APPEAL

Mr. Commissioner:

Please note an Appeal to the County Board of Appeals from the Order of the Deputy Zoning Commissioner of Baltimore County on August 8, 1978.

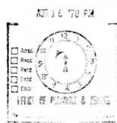
Thomas L. Peddy
Leroy Peddy, Owners
Falls and Valley Roads
Lutherville, Maryland

W. Lee Thomas
409 Washington Avenue
Suite 314
Towson, Maryland 21204
294-6777
Attorney for the Petitioners

CERTIFICATE OF MAILING

I HEREBY CERTIFY, That on this 16th day of August, 1978, a copy of the foregoing Notice of Appeal was mailed to John W. Hession, III, Esquire, County Office Building, Towson, Maryland 21204, Mr. Montgomery Lewis, Executive Director, The Valley Planning Council, Inc., 212 Washington Avenue, Towson, Maryland 21204 and Mrs. Lane Berk, Barlane Farms, Lutherville, Maryland 21093.

W. Lee Thomas



as to the fact that we can place 217 parking spaces on the land owned by BR without the necessity of additional governmental authority. In conjunction with the development to occur, there will be a "tie in" of the Petitioners' property encompassing the Green Spring Inn, an adjacent community sports complex, an existing wine and food shop and the new development. This "tie in" by interior roadways would be a vast improvement over the traffic flow direction possible prior to the Petitioners' acquisition of the one-acre lot designated as parcel 5.

THE REQUEST FOR SPECIAL PERMIT

All parties concerned must understand the nature of the request for special permit; equally, they must understand that the request is not. The request is to use land which, because of location and surrounding land uses, can be used for parking purposes without in any way disrupting the life of any area resident. The request is made so that the Petitioners and the community will be able to enjoy a more aesthetically pleasing shopping and office area by the interpenetration of more "greenery" and planting in what might otherwise be an ordinary, usual and dreary parking lot consisting of an unbroken expanse of concrete. The request is an attempt to make the project as pleasing to the eye as is the wine and food shop now located on parcel 4. The request is an attempt to use land surrounded by BR zoning or existing parking facilities for parking purposes only. The request is not an attempt to obtain on the land zoned BR a larger facility than could otherwise be accommodated. The request is not a "foot in the door" which could be relied upon by others to obtain future area zoning reclassification. (We are not dealing with a request for zoning reclassification but, rather, with a request for special permit for parking purposes.) The request is not an attempt to obtain permitted parking on a parcel of land so that such parking could later be used to support another non-residential use.

A protestant pointed out that extensive landscaping had not yet been undertaken on several of the shuttling lots developed by Petitioners; however, as Mr. Thomas Peddy testified, such landscaping of other areas was necessarily delayed until the Petitioners had completed planning for the entire area. With the Petitioners' present plans, landscaping can now begin.

EFFECT ON THE NEIGHBORHOOD

Although not technically required since this is not a special exception request, uncontested testimony has been presented to the effect that the granting of this special permit will not violate any of the special exception determinants set forth in Section 502.1 of the Baltimore County Zoning Regulations. Protestants have presented no testimony, in fact, precious little speculation which could negate the testimony required by Petitioners as to satisfaction of these section 502.1 requirements. In any event, Mr. Richard Smith's testimony to the effect that the requested parking area is surrounded by BR zoned land

-4-

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ATTORNEY AT LAW
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400 WESTMINSTER AVENUE
BALTIMORE, MARYLAND 21204
JAN 20 1979
204-6777

and other property of the Petitioners makes it clear that parking on the requested area could not have an adverse effect on the property of others.

PURPOSE OF THE REQUEST

Essentially, the Petitioners' request stems from a desire to provide on site the most attractive possible retail and office complex. By definition, this would include extensive landscaping green oases softening the harshness of large parking areas and, where necessary, screening the parking area from public view. We can best illustrate this by exploring the differences between what we have referred to as Plan A and Plan B. Plan A is that plan submitted to the Zoning Commissioner with our request for a parking permit in the figure "7" area. Plan B, introduced as Exhibit A, represents the building plan that will be used if we are unable to use the figure "7" parking permit area. The most cursory examination of the two plans leads to the inescapable conclusion that by use of Plan A, more "greenery" is possible, more attractive and extensive screening is possible, more alleviation of the harshness of a concrete parking lot is possible and a better and more convenient public parking area is provided. Petitioners' use of Plan B, although legally permissible, would not afford these advantages. It is axiomatic that the interests of the Petitioners and the protestants coincide. The reasons for the coincidence of interests are, of course, different. The Petitioners wish to provide, at their expense, a much more attractive setting for their building and a more extensive screening and "greenery" since by so doing, their center will be more desirable for both tenants and users. The Petitioners should desire the use of Plan A in that the general aesthetic quality of the center will be greatly improved.

THE FEARS OF THE PROTESTANTS

It appears that a double-stranded thread of fear engulfing certain protestants has manifested throughout the testimony presented by protestants. The first strand is the fear that by some manner or method, the granting of the special permit would assist or encourage "creeping commercialism." The second strand is the fear that by some manner or method, the granting of the special permit for parking would allow more intensive use of the areas presently BR zoned than is now possible.

The Petitioners, insofar as possible, have attempted to allay the first fear mentioned by reminding the protestants that we are not requesting reclassification which might later be used in justification for expansion of the land in the area zoned BR. We can only remind the Commissioner that the law justifying a change in zoning reclassification requires either a determination that initial error has been committed in classifying a particular tract of land or that a change in circumstances has been found which is of such magnitude as to justify and, in fact, require classification. Again, we are not

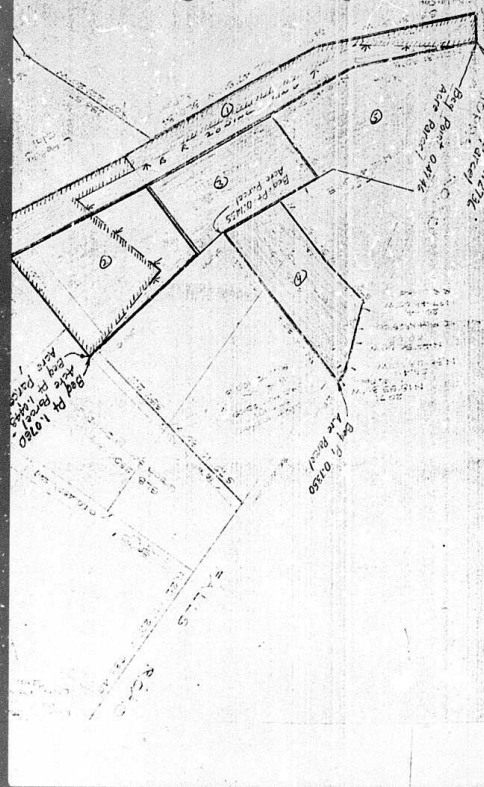
requesting reclassification and any subsequent attempt to use the granting of a special permit for parking as the initial "sine" to justify reclassification from residential would and must be unsuccessful. Neither the zoning authorities nor the courts would hold that such a special permit is justification for utilization of the "change" doctrine.

As to the second fear of the protestants, the Petitioners are able to and they have made an offer to the citizenry which would have the inescapable effect of eliminating the possibility of the very action feared. The Petitioners have offered to enter into a legally binding covenant, running with the land, which would be for the benefit of the area residents and the County as a whole. This covenant would prohibit placing of the land zoned BR commercial or office footage in excess of that now allowed by the existing BR zoning. They have further offered to covenant that the figure "7" for which parking permit is requested may not, in the future, be used as a support parking area for any use other than the use planned - commercial center. These covenants would be enforceable and could not be eliminated by the Baltimore County planning and zoning bodies nor by the political authorities whomever they may be. Rather, such covenants would always be enforceable in full by the Circuit Court of Baltimore County and the Appellate Courts of Maryland.

In view of the above summary and argument, the Petitioners earnestly request that the Deputy Zoning Commissioner grant their request for the use of the designated area for parking purposes.

7/7/78

W. Lee Thomas
Attorney for the Petitioners



IDCA APPLICATION FOR SPECIAL EXCEPTION AND OR SPECIAL PERMIT

TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY

OF Lefboy Peddy & Thomas L. Peddy LEGAL OWNER OF THE PROPERTY SHOWN IN BALTIMORE COUNTY THE PROPERTY OUTLINE OF WHICH IS SHOWN TO BOLD COUNTY WITH SHADINGS AND NOTED ON 200 FT SCALE MAPS, WHICH ARE ATTACHED HERETO, HEREBY MAKE APPLICATION TO FILE FOR A SPECIAL

Parking Permit DR 2 & RC 2
ONE (1) IN A 100' ZONE TO USE THE HEREIN DESCRIBED PROPERTY FOR

Off-Street Parking

THE PROPERTY IS EXPECTED TO BE IMPROVED AS FOLLOWS: DTG 4897-224 OTG 4897-235

GROSS SITE AREA 3.21 Acs. DEED REF. OTG 4897-230

GRADING 90% % OF OVERALL SITE SHALL REQUIRE GRADING.

BUILDING SIZE GROUND FLOOR 64' x 220' AREA 13,680' TOTAL HEIGHT 40'

NUMBER OF FLOORS 3 TOTAL HEIGHT 40'

FLOOR AREA GROUND FLOOR 13,680' TOTAL FLOOR AREA DIVIDED BY SITE AREA = 0.29

BUILDING USE Ground Floor Retail Other Floors Office Use

REQUIRED NUMBER OF PARKING SPACES

GROUND FLOOR 62 OTHER FLOORS 56 TOTAL 125

PARKING

AREA OF SITE TO BE PAVED TO ACCOMMODATE REQUIRED PARKING SPACES 45,000 sq. ft.

(PAVED AREA MAY BE ESTIMATED BY MULTIPLYING REQUIRED NUMBER OF SPACES BY 360')

UTILITIES

WATER: ☒ PUBLIC ☐ PRIVATE, TYPE OF SYSTEM

SEWER: ☒ PUBLIC ☐ PRIVATE, TYPE OF SYSTEM

UTILITIES SECURITY ARRANGEMENT See attached security plan

I CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

APPLICANT, LESSEE OR CONTRACT PURCHASER Lefboy Peddy, LEGAL OWNER Thomas L. Peddy

ADDRESS Falls & Valley Roads

Lutherville, Md. 21093

823-8600

THE PLANNING BOARD HAS DETERMINED ON 3-16-78 THAT THE PROPOSED DEVELOPMENT DOES NOT CONFORM TO THE REQUIREMENTS OF SECTION 500.7 OF THE BALTIMORE COUNTY CODE.

DATE 3/16/78 SIGNED Eric Di Nenna CHAIRMAN, BALTIMORE COUNTY PLANNING BOARD

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DATE 3/16/78 SIGNED Eric Di Nenna CHAIRMAN, BALTIMORE COUNTY PLANNING BOARD

DESCRIPTION

Direct Dial Number

1.5194 ACRE PARCEL, PART OF THE LAND OF LEROY
PEDDY AND OTHERS, NORTHEAST SIDE OF JOPPA ROAD
AT FALLS ROAD, EIGHTH ELECTION DISTRICT, BALTIMORE
COUNTY, MARYLAND.

This Description is for Parking Permit
In a Residential Zone.

Beginning for the same on the northeast side of Joppa
Road and at the beginning of the 19th line of the first parcel
of land described in the deed to LeRoy Peddy and others,
recorded among the Land Records of Baltimore County in
Liber O.T.G. 4897, page 230, said beginning point being
distant 900 feet, more or less, as measured southeasterly
along the northeast side of Falls Road and Joppa Road from
the intersection of said northeast side of Falls Road with the
center line of Green Spring Valley Road, as extended easterly,
running thence binding on a part of said 19th line,
(1) N 21° 31' 50" E 34.31 feet, thence along the easternmost

ENGINEERS • ARCHITECTS • PLANNERS

2.

line of the area zoned "BR-CR" on the Zoning Map of Baltimore
County five courses: (1) N 35° 17' 15" E 165.88 feet,
(3) N 02° 47' 50" E 433.10 feet, (4) N 03° 37' 20" E 113.21 feet,
(5) S 72° 39' 30" W 185.35 feet, and (6) N 17° 20' 30" W 193.53 feet,
thence along the north side of the forty foot road referred to in the
deed to Green Spring Inn, Inc., recorded among said Land Records
in Liber O.T.G. 4897, page 224, and in the deed to Harry F.
McCaffrey and wife, recorded in Liber T.B.S. 1766, page 142, two
courses: (7) N 85° 47' 33" E 59.61 feet, and (8) N 84° 03' 00" E
225.00 feet, thence along the east side of the 66 foot right of way of
the Consolidated Gas, Electric Light and Power Company of
Baltimore two courses: (9) S 05° 37' 20" W 273.58 feet, and
(10) S 02° 47' 50" W 367.82 feet, thence binding on the 17th line
of the land first herein mentioned, (11) S 21° 31' 50" W 279.01 feet,
and thence binding on the northeast side of Joppa Road and on the
18th line of said first mentioned land, (12) N 55° 03' 10" W 51.40 feet
to the place of beginning.

Containing 1.5194 acres of land,

HGW:mps J.O. 1-5037-P 1,23/78
W.O. 20516-C



BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

Mr. Leslie H. Graef
TO: Director of Planning
Mr. S. Eric DiNenna
FROM: Zoning Commissioner
Case No. 78-267-SPH (Item No. 204)
SUBJECT: Leroy and Thomas L. Peddy - Petitioner

Date: May 25, 1978

I am in receipt of your request of May 19, 1978, to postpone the hearing
scheduled for June 12, 1978, regarding the subject Petition. Unfortunately,
your request was received following submission to the newspapers for advertis-
ing. Also, it must be kept in mind that the Petitioners have the right to have
their case heard at the scheduled time of the hearing, though they may stipulate
to a postponement.

I am aware of the dilemma of time involved and suggest that any com-
ments, subsequent to the hearing, be forwarded to me. The Petitioners and/
or Protestants, if any, will be afforded the opportunity to request, in writing,
a continued hearing.

If I can be of any further assistance, please do not hesitate to contact
me.

S. ERIC DINENNA
Zoning Commissioner

SED:sn

cc: Mr. George J. Martinak
Deputy Zoning Commissioner

Mr. James E. Dyer
Zoning Supervisor

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

S. Eric DiNenna
TO: Zoning Commissioner
Leslie H. Graef
FROM: Director of Planning
Perry Property: Use Permit
SUBJECT: for Parking in a Residential Zone

Date: May 19, 1978

As you are aware, the Planning Board is particularly concerned with
the development plans for the Perry property at Falls and Joppa Roads.
At the time the Board approved the subject petition under the IDA
provisions, I agreed to bring the application to them for their review
and input prior to the forwarding of my comments to you for the zoning
hearing.

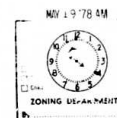
In view of the fact that the subject petition has been scheduled for
June 14 and that the next Board meeting is June 15th, I would appreciate
your rescheduling this hearing to the week after the Planning Board
hearing.

I realize that this is an unusual request, but I believe the issues
concerning proposed development here are particularly difficult ones
and need full review by my Board. I'd greatly appreciate your cooperation
in this matter.

Sincerely,

Leslie H. Graef
Director of Planning

LHG:JGJ:rw
cc: All Planning Board Members
W. Lee Thomas, Esquire
Attorney for the Petitioner



W. LEE THOMAS, P.A.
ATTORNEYS AT LAW
SUITE 304
400 WASHINGTON AVENUE
TOWSON, MARYLAND 21204

May 31, 1978

S. Eric DiNenna, Esquire
Baltimore County Zoning
Commissioner
County Office Building
Baltimore, Maryland 21204

Re: Case No. 78-267-SPX
Perry Property: Use Permit for
Parking in a Residential Zone

Dear Mr. DiNenna:

As you can see from the copy of my letter to Mr. Bober,
we have, as usual, attempted to cooperate fully with
Baltimore County and its various Departments and, because
of Mr. Graef's promise to the Planning Board, we have
is contained in the letter to Mr. Bober. I am also
enclosing ten copies of the amended site plan which, of
course, is the site plan that we will be considering at the
scheduled hearing on June 12, 1978.

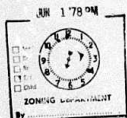
Very truly yours,

W. Lee Thomas

WLT:gs

Enclosure-s

cc: Mr. Thomas L. Peddy



W. LEE THOMAS, P.A.
ATTORNEYS AT LAW
SUITE 304
400 WASHINGTON AVENUE
TOWSON, MARYLAND 21204

May 31, 1978

Mr. Gene Bober
Baltimore County Department of
Planning and Zoning
County Office Building
Towson, Maryland 21204

Re: Case No. 78-267-SPX
Perry - Green Spring Station

Dear Mr. Bober:

I understand that Mr. Graef has previously promised
the Planning Board that he would present to it the Perry
development proposal before the hearing thereon is held
before the Baltimore County Zoning Commissioner and I
further understand that the Planning Board wants to see the
integration by plat of the existing commercial facilities
owned by the Petitioners adjacent to the planned additional
facility. Therefore, after talking with Mr. Graef, I have
had our engineer prepare a new site plan, a copy of which
is attached and labelled "A." This site plan is quite
similar to the one submitted to the Baltimore County Depart-
ment of Planning and Zoning in applying for the Special
Permit; however, the enclosed plat does include the property
generically known as the Wine Merchant, a presently existing
commercial facility. In addition to including that property,
the legend or the plat has been changed inasmuch as the
property area has been thereby increased and the parking
requirements have been thereby altered.

I am also enclosing a second plat labelled "B," with the
prime purpose of indicating conclusively that the planned
commercial facilities, including the existing Wine Merchant,
can be constructed under existing zoning in that, by use of
the configuration or Plat B, sufficient parking spaces are
afforded to support the commercial and office facility.

W. LEE THOMAS, P.A.

Mr. Gene Bober

May 31, 1978

Obviously, we would prefer to use the configuration on
Plat A since that would enable us to more attractively land-
scape the area by utilizing for parking the remaining portion
of the land under the transmission line and the small tract
to the north of the zoned property. You will note that the
land for which Special Permit Parking is requested is
surrounded by either commercially zoned land, the Baltimore
Gas & Electric Company major transmission line and other
parking areas. Frankly, I cannot imagine a better use for
this land, especially since by so using it, the commercial
and office facilities that will be constructed can be made
even more attractive.

Very truly yours,

W. Lee Thomas

WLT:gs

Enclosures

cc: S. Eric DiNenna, Esquire
Mr. Leslie H. Graef
Mr. Thomas L. Peddy

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

S. Eric DiNenna
TO: Zoning Commissioner
Leslie H. Graef
FROM: Director of Planning
Zoning Petition #78-267-SPH
SUBJECT: Leroy and Thomas Peddy Property

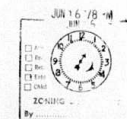
Date: June 16, 1978

At its regular meeting on June 15, 1978, the Planning Board adopted a
motion supporting my comments on the subject petition dated June 7, 1978.
I appreciate your cooperation in this matter.

Leslie H. Graef
Director of Planning

LHG:JGJ:rw

cc: George Martinak, Deputy Zoning Commissioner
J.C. Howell



August 23, 1978

Mr. Montgomery Lewis
Executive Director
The Valley Planning Council, Inc.
212 Washington Avenue
Towson, Maryland 21204

RE: Petition for Special Hearing
225/6 of Joppa Road, approximately 900' SE
of Green Spring Valley and Falls Roads -
3rd Election District
Thomas L. LeRoy, et al - Petitioners
NO. 78-267-SPH (11-1-78)

Dear Mr. Lewis:

Please be advised that an appeal has been filed by W. Lee Thomas, Esquire, in behalf of Thomas L. and Leroy Peddy, from the decision rendered by the Deputy Zoning Commissioner of Baltimore County in the above captioned matter.

You will be notified of the date and time of the appeal hearing when it is scheduled by the Baltimore County Board of Appeals.

Very truly yours,

James J. Hession, III

JAMES J. Hession, III
Deputy Zoning Commissioner

CJH/ao

cc: Mrs. Lane Berk
Berlans Farms
Lutherville, Maryland 21093
John W. Hession, III, Esquire
People's Counsel

494-3180

County Board of Appeals
Room 219, Court House
Towson, Maryland 21204
December 4, 1980

W. Lee Thomas, Esquire
409 Washington Avenue
Towson, Md. 21204

Re: Case No. 78-267-SPH
Thomas L. Peddy, et al

Dear Mr. Thomas:

Enclosed herewith is a copy of the Opinion and Order passed today by the County Board of Appeals in the above entitled case.

Very truly yours,

Edith I. Eisenhart
Edith I. Eisenhart, Admin. Secretary

Encl.

cc: Mrs. Judy Boer
Mrs. Lane Berk
Messrs. Thomas and Leroy Peddy
Mrs. Nancy Hargest
John W. Hession, III, Esquire
Mr. J. E. Dyer
Mr. W. E. Hammond
Mr. N. E. Gerber
Mr. J. Howell

W. LEE THOMAS, P.A.
ATTORNEYS AT LAW
SUITE 304
409 WASHINGTON AVENUE
TOWSON, MARYLAND 21204

W. LEE THOMAS
DAVID A. WILSON

AREA CODE 301
396-4377

August 1, 1980

Mr. Walter A. Reiter, Jr., Chairman
County Board of Appeals
Court House
Towson, Maryland 21204

Re: Case No. 78-267-SPH - Peddy
off Street Parking in a Residential Zone

Dear Mr. Reiter:

In accordance with instructions given us by the Board at the hearing in the above matter on December 5, 1979, we have agreed:

(a) On an amended property description reducing substantially the area for which off street parking in a residential zone is requested; and

(b) On language for insertion in the Board's Order if the Board feels it appropriate so to do.

This amended description and agreed upon language is attached to this letter labelled Attachments A and B, respectively. The Petitioner's Exhibits 1 and 2 mentioned in the agreed upon language are, of course, Exhibits presently in your file pertaining to this matter.

I have been specifically authorized by Mr. Hession and Mr. Roswell to inform you that all parties are in agreement as to the above.

Very truly yours,

W. Lee Thomas
W. Lee Thomas

WLT:gs

Enclosures
cc: John W. Hession, 3rd, Esquire
Mr. James Roswell
Mr. Thomas L. Peddy

RECEIVED
BALTIMORE COUNTY
NOV 12 1980
COURT HOUSE
TOWSON, MD

Attachment B

The area contained within the amended description of Petitioner's Exhibit No. 2 pertaining to the parking permit which is the subject of this case produces 81 parking spaces. Of this total, 56 spaces are being transferred from the adjacent commercial parcel shown on Petitioner's Exhibit #2. The 56 spaces so transferred shall be subtracted from the total of 236 spaces now available and maintained on the commercial parcel as shown on Petitioner's Exhibit No. 2, and may be included in any calculation to fulfill parking requirements imposed on Petitioner's rental and business activities now or hereafter conducted on the commercial parcel shown on Petitioner's Exhibit #2. The balance of 25 spaces as shown on the parking permit site on Petitioner's Exhibit #2 shall not be included in any such calculations as a credit to fulfill parking requirements imposed on Petitioner's rental and business activities on said commercial parcel, the intent being that those additional 25 spaces shall remain as surplus spaces. In summary, of the total of 261 spaces shown on Petitioner's Exhibit No. 2, only 236 may at any time be used to fulfill the parking requirements now or hereafter imposed on Petitioner's rental and business activities now or hereafter conducted on the said commercial parcel. Location of landscaping and trees as shown on Petitioner's Exhibit No. 2 shall be placed and maintained in accordance with said plan.

11/13/79--I notified the following of POSTPONEMENT from Nov. 28 at 10 a.m. and REASSIGNMENT for WEDNESDAY, DECEMBER 5, 1979, at 9 a.m.

Messrs. Thomas L. & Leroy Peddy W. Lee Thomas, Esq. "Mrs. Judy Boer Mrs. Lane Berk Mrs. Nancy Hargest John W. Hession, III, Esq. Mr. J. E. Dyer Wm. Hammond John Seyffert Bd. of Education Carol Beresh	Petitioners Counsel for Petitioners Protestant People's Counsel Zoning Planning
---	--

KIDDE CONSULTANTS, INC.
Subsidiary of Walter Kidde & Company, Inc.

2.

the 66 foot right of way of the Consolidated Gas, Electric Light and Power Company of Baltimore two courses: (8) S 05° 37' 20" W 273.58 feet, and (9) S 02° 47' 50" W 367.82 feet, thence binding on the 17th line of the land first herein mentioned, (10) S 21° 31' 50" W 279.01 feet, and thence binding on the northeast side of Joppa Road and on the 18th line of said first mentioned land, (11) N 55° 03' 10" W 51.40 feet to the place of beginning.

Containing 0.77 acres of land, more or less.

RMB:mps

J.O. 1-75037-P
W.O. 26596-X

December 10, 1979



KIDDE CONSULTANTS, INC.
Subsidiary of Walter Kidde & Company, Inc.

Walter Kidde & Company, Inc.
1000 Connecticut Avenue, N.W.
Washington, D.C. 20036
BALTIMORE, MARYLAND 21204
(301) 361-5555

DESCRIPTION

Direct Dial Number

0.77 ACRE PARCEL, MORE OR LESS, PART OF THE LAND OF LEROY PEDDY AND OTHERS, NORTHEAST SIDE OF JOPPA ROAD AT FALLS ROAD, EIGHTH ELECTION DISTRICT, BALTIMORE COUNTY, MARYLAND.

This Description is for Parking Permit
in a Residential Zone

Beginning from the same on the northeast side of Joppa Road at the beginning of the 19th line of the first parcel of land described in the deed to Leroy Peddy and others, recorded among the Land Records of Baltimore County in Liber O.T.G. 4897, page 230, said beginning point being distant 900 feet, more or less, as measured southeasterly along the northeast side of Falls Road and Joppa Road from the intersection of said northeast side of Falls Road with the center line of Green Spring Valley Road, as extended easterly, running thence hindering on a part of said 19th line, (1) N 21° 1' 50" E 34.31 feet, thence along the easternmost line of the area zoned "BB-CR" on the Zoning Map of Baltimore County four courses: (2) N 35° 17' 15" E 165.88 feet, (3) N 02° 47' 50" E 433.10 feet, (4) N 05° 37' 20" E 113.21 feet, and (5) S 72° 39' 30" W 35.84 feet, and thence (6) N 05° 37' 20" E 161.46 feet to the north side of the forty foot road referred to in the deed to Green Spring Inn, Inc., recorded among said Land Records in Liber O.T.G. 4897, page 224, and in the deed to Harry F. McCaffrey and wife, recorded in Liber T.B.S. 1766, page 142, thence along the north side of the forty foot road, (7) N 04° 03' 00" E 67.37 feet, thence along the east side of

ENGINEERS • ARCHITECTS • PLANNERS

494-3180

County Board of Appeals
Room 219, Court House
Towson, Maryland 21204

September 29, 1978

W. Lee Thomas, Esq.
409 Washington Ave.
Towson, Md. 21204

Re: File No. 78-267-SPH
Thomas L. Peddy, et al

Dear Mr. Thomas:

- Number of witnesses you anticipate calling 5
- How many of these witnesses will be "expert witnesses"? 3
- Fields to be covered by experts you intend to call - please check:
Land Planner ☒
Real Estate ☐
Engineer ☒
Traffic ☐
Other ☒
- Total time required (in hours) for presentation of your side of the case
Four

W. Lee Thomas
Attorney for Protestants ()
Attorney for Petitioners (X)

Filed 10-10-78
2:15 PM

Zoning Board of Appeals

Room 219, Court House
Towson, Maryland 21204

September 29, 1978

Mr. Montgomery Lewis
Executive Director
Valleys Planning Council, Inc.
212 Washington Ave.
Towson, Md. 21204

Re: File No. 78-267-SPH
Thomas L. Paddy, et al

Dear Mr. Lewis:

1. Number of witnesses you anticipate calling _____
2. How many of these witnesses will be "expert witnesses"? _____
3. Fields to be covered by experts -ou intend to call - please check:

Land Planner _____

Real Estate _____

Engineer _____

Traffic _____

Other 4

4. Total time required (in hours) for presentation of your side of the case _____

W. Lewis
Attorney for Petitioners ()

Attorney for Petitioners ()

W. LEE THOMAS, P.A.
ATTORNEY AT LAW
SUITE 304
400 WASHINGTON AVENUE
TOWSON, MARYLAND 21204

W. LEE THOMAS
DAVID A. WILSON

AREA CODE 410
286-6272

August 11, 1978

Mr. Eric S. DiNenna
Zoning Commissioner of Baltimore County
Room 121 - County Office Building
111 West Chesapeake Avenue
Towson, Maryland 21204

Re: Petition For Special Hearing
For Off-Street Parking, N/S of
Joppa Road, Jr. Election District,
Baltimore County, Maryland;
Thomas L. Paddy, Et Al, Petitioners
No. 78-267-SPH (Item No. 204)

Dear Mr. DiNenna:

Please file the enclosed Notice of Appeal in the above captioned matter. I have enclosed my check in the amount of \$35 representing fee for Appeal other than an appeal concerning reclassification, districting or special exception.

Very truly yours,

W. Lee Thomas
W. Lee Thomas

1/LS/syl

Enclosures

cc: John W. Hession, III, Esquire
Mr. Montgomery Lewis
Mrs. Lora Berk



Seminary Ridge Owners Association, Inc.

June 27, 1978.

Mr. George J. Martinak,
Deputy Zoning Commissioner,
Baltimore County Office Building,
Towson, Maryland. 21204.

Dear Mr. Martinak:

As you requested, I am enclosing a copy of the statement I read at the June 27th hearing in regard to the Special Exception request by the Messrs. Leroy and Thomas Paddy.

This statement was authorized by unanimous vote at the May 25th meeting of the Board of Directors of the Seminary Ridge Owners Association, Inc. Since development will touch the borders of our community, we are vitally concerned over the judgments made in this case.

Thank you.

Sincerely,

Jean S. Porter
Jean S. Porter
President

8339 Tally Ho Road
Lutherville, MD 21093

jsp



My name is Jean Porter, 8339 Tally-Ho Road. I am President of the Seminary Ridge Owners Association and the statement I will read is a statement of position of the community in this regard.

We are unanimously and irrevocably opposed to the approval of the proposed parking lot on land zoned RC-5.

We realize that this is one of the last green rural areas around the entire Baltimore County portion of the Beltway and therefore ripe for development. We treasure this area and would love to keep it entirely rural. However, we realize that we cannot expect the land-owners to subsidize or support our rural atmosphere. We do not want to deprive the owners of livelihood, profit or prestige.

We do feel, most emphatically, that development should conform to the surrounding rural, semi-rural residential areas at least, and not to the commercial area. We object to the malignant encroachment of commercial development even one foot further away from the Falls and Joppa Roads intersection where it is already being spread in all directions. We object to any further commercial development in this entire area. We object to what has already been commercially developed here, as well, although we are unable to do anything about it, or the manner in which it was inflicted upon us.

We hereby request you to deny any special exceptions which would allow this parking lot for commercial development.

We have the complete support of Seminary Valley Council which represents over 2100 families in the immediately affected areas.



JSP

THE VALLEYS PLANNING COUNCIL, INC.

212 Washington Avenue
P.O. Box 5402
Towson, Maryland 21204
Valley 8-7607

July 27, 1978

Mr. John Martinak
Deputy Zoning Commissioner
Office of Planning and Zoning
County Office Building
111 West Chesapeake Avenue
Towson, Maryland 21204

Dear Mr. Martinak:

Enclosed herewith is a transcript of my remarks at the 6/27/78 hearing concerning the request of the Paddy family for a special exception for parking for their proposed commercial development at Falls and Valley Roads.

I am afraid that I cannot report to you any concrete progress respecting an agreement between our own organization and the Paddy family along the lines of the covenant proposed to us by Tom Paddy. Consideration by the full board of the Valleys Planning Council is required on this critical matter, and I regret to say such a meeting for this purpose has not yet been possible.

I assure you we will try to reach a consensus on this just as soon as is possible.

Sincerely yours,

Montgomery Lewis
Montgomery Lewis
Executive Director

Enclosure

u/cc



THE VALLEYS PLANNING COUNCIL, INC.

212 Washington Avenue
P.O. Box 5402
Towson, Maryland 21204
Valley 8-7607

Thank you, My name is Montgomery Lewis and I speak as Planning Director of the Valleys Planning Council, a community organization with vital concern for what happens at Falls and Valley Roads. My statement reflects the position of our Board, which has discussed the subject of today's hearing numerous times in executive and full Board sessions. And I should say that my statement must come as no surprise to anyone as it is entirely consistent with previous testimony before the Planning Board, the County Council and the Zoning Commission.

Quite simply, because we fear its effects on the already impacted Valley Road traffic and the rural-residential values we've worked so long to preserve - we are opposed to the intensification of activity at Falls and Valley Roads.

And although we have had lengthy and I should add amiable discussions with Tom and LeRoy Paddy, we cannot understand the requested extension as anything but an intensification of commercial land use. To our minds the proposed exception providing about 100 extra spaces will actually help generate traffic not only to Green Spring Station but to all other projects - present and contemplated - on the Paddy Land. And it is conceivable to us - with respect to future additions in the complex - that these could be designed larger than zoning would ordinarily permit by reliance on the extra parking in the area provided by any extended parking sanctioned now.

In our eyes, granting of the requested exception represents a precedent for future exceptions which would - taken as a group - completely destroy the delicate balance between commercial activity and environmental values sought by the mapping process and supposedly safeguarded by our zoning map.

For these reasons, then, we oppose the requested exception and urge its denial.

Statement by M. Lewis 6/28/78 for
Valleys Planning Council
Before Deputy Zoning Commissioner
Pertaining to Petition by Paddy Family
for Special Exception for Parking
Spaces



CERTIFICATE OF POSTING
ZONING DEPARTMENT OF BALTIMORE COUNTY
Towson, Maryland

District: 8th Date of Posting: MAY 25, 1978
Posted for: PETITION FOR SPECIAL HEARING
Petitioner: LEROY PADDY & THOMAS L. PADDY
Location of property: NE 1/4 OF JOPPA RD. 900' N. OF FALLS RD. SE OF THE INTERSECTION OF GREEN SPRING VALLEY RD. & FALLS RD.
Location of Sign: NE 1/4 OF JOPPA RD. 900' N. OF FALLS RD. SE OF THE INTERSECTION OF GREEN SPRING VALLEY RD. & FALLS RD.
Remarks: _____
Posted by: Thomas L. Paddy Date of return: JUN 2, 1978
Signature: _____

W. Lee Thomas, Esquire
409 Washington Avenue
Suite 314
Towson, Maryland 21204

BALTIMORE COUNTY OFFICE OF PLANNING & ZONING

County Office Building
111 W. Chesapeake Ave.
Towson, Maryland 21204

Your Petition has been received and accepted for filing
this 4th day of April 1978.

Eric DiNenna
S. ERIC DI NENNA
Zoning Commissioner

Petitioner: Leroy and Thomas Paddy
Petitioner's Attorney: W. Lee Thomas

Reviewed by:

cc: Fields Consultants, Inc.
1020 Greenwell Bridge Road
Baltimore Maryland 21204

Nicholas B. Commodari
Chairman, Zoning Plans
Advisory Committee

PETITION MAPPING PROGRESS SHEET

FUNCTION	Wall Map date by	Original date by	Duplicate date by	Tracing date by	200 Sheet date by
Descriptions checked and outline plotted on map			<u>5/24</u>	<u>APB</u>	
Petition number added to outline					
Denied					
Granted by: ZC, RA, CC, CA					
Reviewed by: <u>WLP</u>	Revised Plans: Change in outline or description: Yes _____ No _____				
Previous case: <u>77-413</u>	Map # <u>3C</u>				

BALTIMORE COUNTY OFFICE OF PLANNING & ZONING

County Office Building
111 W. Chesapeake Avenue
Towson, Maryland 21204

Your Petition has been received * this 23 day of MAY 1978. Filing Fee \$ 25. Received check
Cash _____
Other _____

Eric DiNenna
S. ERIC DI NENNA
Zoning Commissioner

Petitioner: Paddy Submitted by: Thomas
Petitioner's Attorney: W. Lee Thomas Reviewed by: WLP

* This is not to be interpreted as acceptance of the Petition for assignment of a hearing date.

THIS IS TO CERTIFY, that the annexed advertisement of
PETITION FOR SPECIAL HEARING - LeRoy Paddy and
w/o, inserted in the following:

- ☐ Catonsville Times ☒ Towson Times
☐ Dundalk Times ☐ Arbutus Times
☐ Essex Times ☐ Community Times
☐ Suburban Times East ☐ Suburban Times West

weekly newspapers published in Baltimore County, Maryland,
once a week for one successive weeks before the
25th day of May, 1978, that is to say, the same
was inserted in the issues of May 25, 1978

STROMBERG PUBLICATIONS, INC.
BY *Erin Burge*

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT
No. 755618
DATE May 18, 1978 ACCOUNT 01-662
AMOUNT \$25.00
RECEIVED V. Lee Thomas, Reel, Suite 311, 109 Washington Ave.
FOR Towson, Md. Filing Fee for LeRoy Paddy, Case No. 78-267-SPH
25001588 19 25.00
VALIDATION OR SIGNATURE OF CASHIER

CERTIFICATE OF PUBLICATION

TOWSON, MD. May 25, 1978

THIS IS TO CERTIFY, that the annexed advertisement was
published in THE JEFFERSONIAN, a weekly newspaper printed
and published in Towson, Baltimore County, Md., on May 25
at one time once before the 25th
day of June, 1978, the one publication
appearing on the 25th day of May,
1978.

THE JEFFERSONIAN,
H. Leonard Shuster
Manager

Cost of Advertisement, \$

CERTIFICATE OF POSTING
ZONING DEPARTMENT OF BALTIMORE COUNTY
Towson, Maryland

District 3rd Date of Posting Oct. 3, 1978

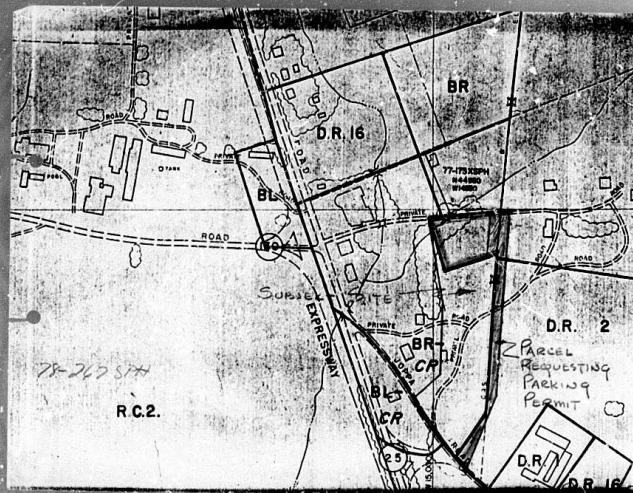
Posted for: APPEAL
Petitioner: THOMAS L. PADDY, et al.
Location of property: NE/S. of Joppa Rd. APPROX 900' SE. of
GREENSPRING VALLEY & FALLS Rds.
Location of Sign: NE/S. of Joppa Rd. APPROX 900' SE. of
GREENSPRING VALLEY & FALLS Rds.

Remarks:
Posted by Thomas L. Paddy Date of return: Oct. 6, 1978
Signature

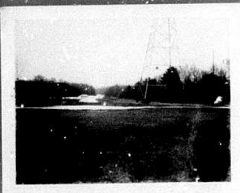
1-SIGN

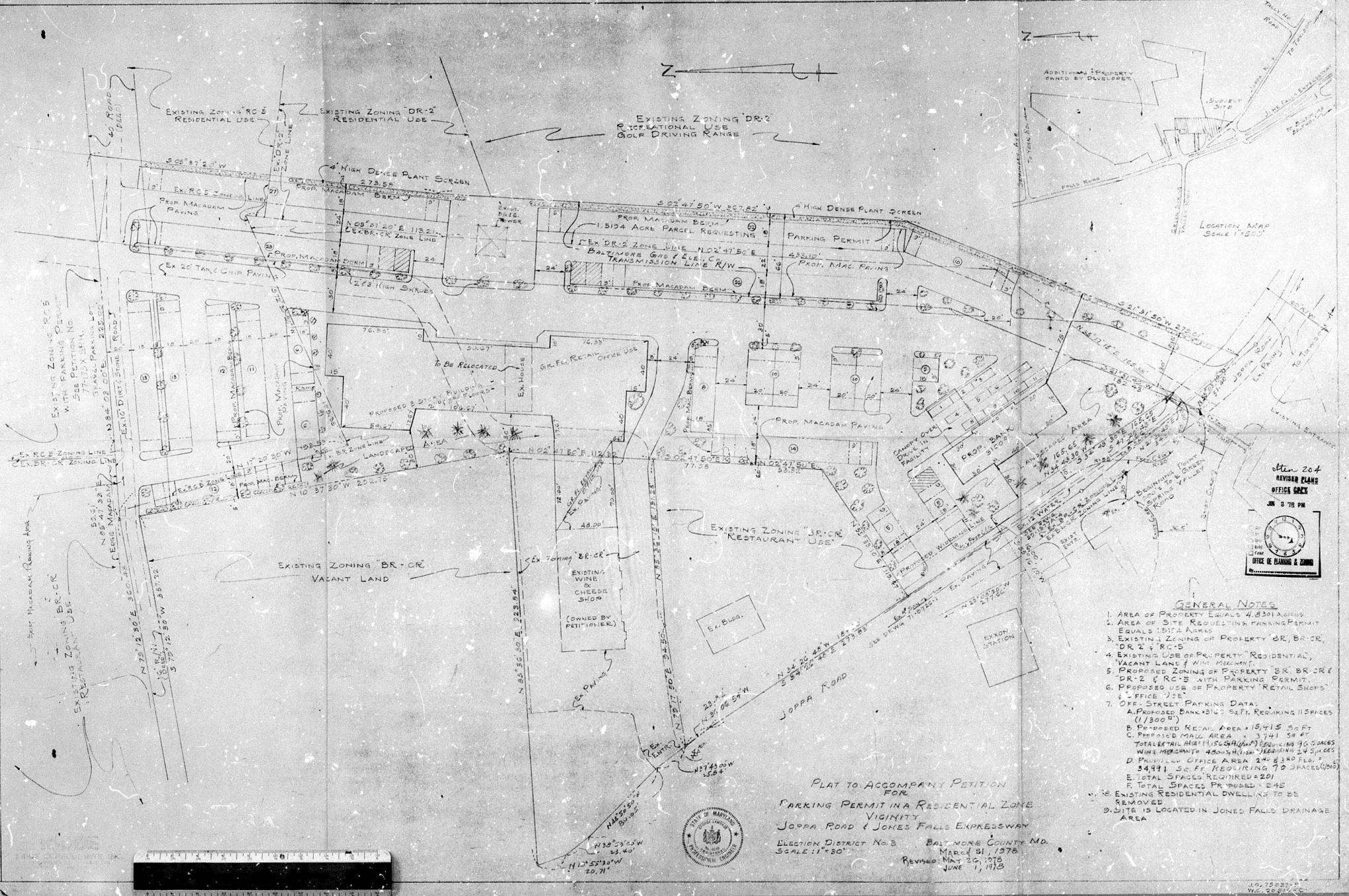
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT
No. 73326
DATE June 12, 1978 ACCOUNT 01-662
AMOUNT \$72.20
RECEIVED V. Lee Thomas, Reel
FOR Cost of Advertising and Posting for Case No. 78-267
78-267-SPH - Thomas L. Paddy, et al
72201588 13 72.20
VALIDATION OR SIGNATURE OF CASHIER

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT
No. 73476
DATE August 23, 1978 ACCOUNT 01-662
AMOUNT \$10.00
RECEIVED V. Lee Thomas, Reel, Suite 311, 109 Washington Ave., Towson, Md. 21204
FOR Cost of Appeal for Case No. 78-267-SPH - Thomas L. Paddy, et al
10000000 24 10.00
VALIDATION OR SIGNATURE OF CASHIER



78-267-SPH June 12, 1978
Baltimore County Zoning Commission
11 West Chesapeake Ave
Towson, Md 21204
Dear Mr. O'Mann,
As a group of people living in the area
of Falls & Valley Rds. we want to request
one without protest to the increased
parking lot area being requested by
Mr. Paddy for his proposed building. The
increasing commercialization in this area
is threatening to us.
The Green Spring Valley Garden Club





- GENERAL NOTES**
1. AREA OF PROPERTY EQUALS 4.8201 ACRES.
 2. AREA OF SITE REQUESTING PARKING PERMIT EQUALS 1.5124 ACRES.
 3. EXISTING ZONING OF PROPERTY "BR, BR-CR, DR-2 & RC-5".
 4. EXISTING USE OF PROPERTY "RESIDENTIAL, VACANT LAND & WINE MERCHANT".
 5. PROPOSED ZONING OF PROPERTY "BR, BR-CR & DR-2 & RC-5 WITH PARKING PERMIT".
 6. PROPOSED USE OF PROPERTY "RETAIL SHOPS & OFFICE USE".
 7. OFF-STREET PARKING DATA:
 A. PROPOSED BANK BLDG. 52,111 SQ. FT. REQUIRING 112 SPACES (1/1300 FT)
 B. PROPOSED RETAIL AREA = 15,415 SQ. FT.
 C. PROPOSED MALL AREA = 3,741 SQ. FT.
 TOTAL RETAIL MALL (B+C+D) REQUIRING 96 SPACES
 WINE MERCHANT 450 SQ. FT. REQUIRING 24 SPACES
 D. PROPOSED OFFICE AREA 24,430 SQ. FT. = 54,941 SQ. FT. REQUIRING 70 SPACES (1/1000)
 E. TOTAL SPACES REQUIRED = 201
 F. TOTAL SPACES PROVIDED = 245
 G. 16 EXISTING RESIDENTIAL DWELLINGS TO BE REMOVED
 H. SITE IS LOCATED IN JONES FALLS DRAINAGE AREA

PLAT TO ACCOMPANY PETITION
FOR
PARKING PERMIT IN A RESIDENTIAL ZONE
VICINITY
JOPPA ROAD & JONES FALLS EXPRESSWAY
ELECTION DISTRICT No. 3 BALTIMORE COUNTY, MD.
SCALE: 1" = 30'
MARCH 31, 1978
REVISED MAY 25, 1978
JUNE 1, 1978



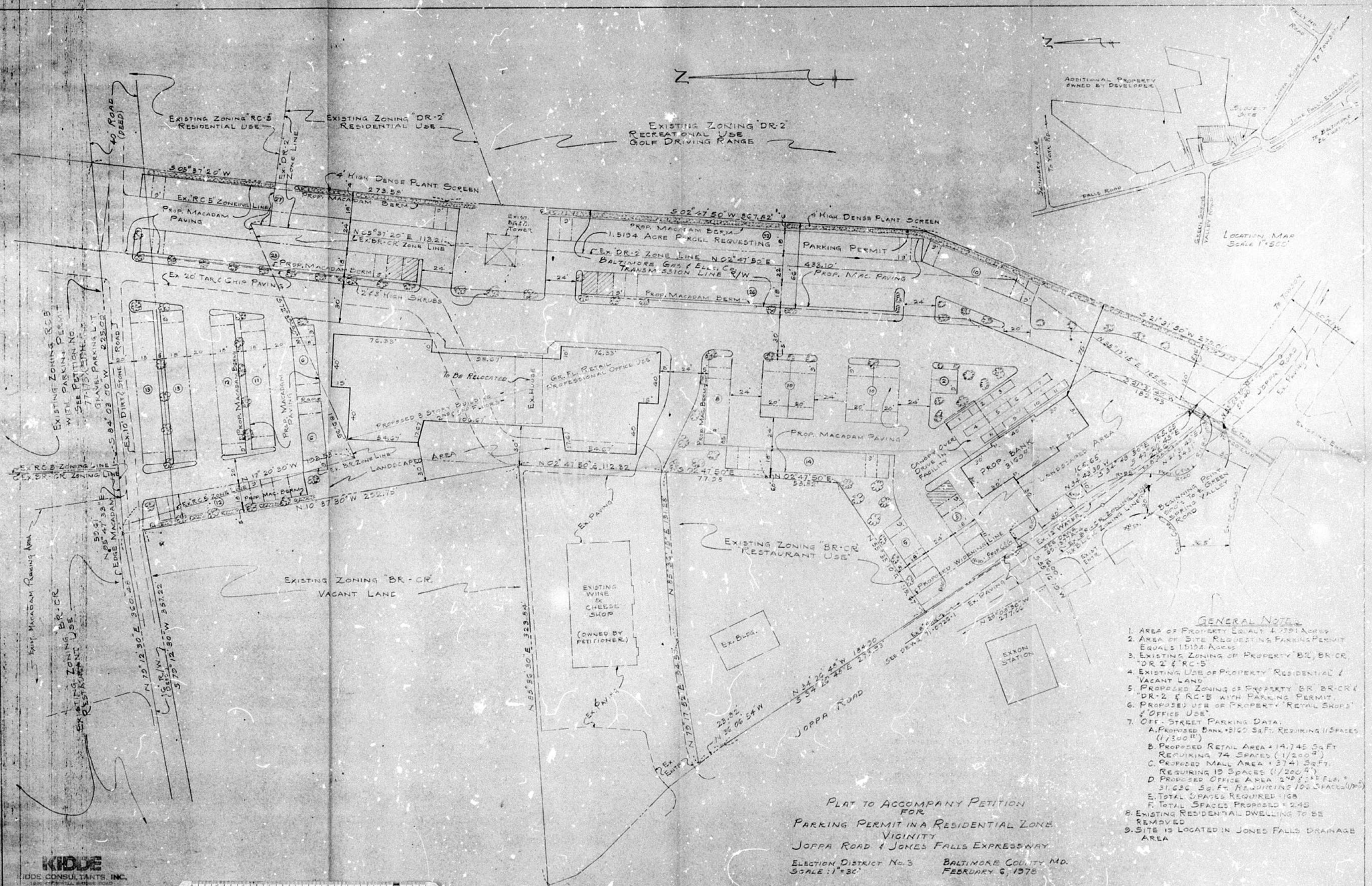
PHOTOGRAMMETRIC MAP OF
BALTIMORE COUNTY METROPOLITAN AREA

REVISIONS	DATE	SCALE	LOCATION	SHEET
1	4-11-76	1" = 200'	BROOKLANDVILLE	N. W.
2	10-1-76	1" = 200'		12-5

S-SW S-SE



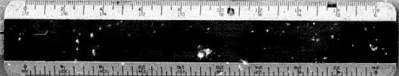
1953 Twp 1953 Twp

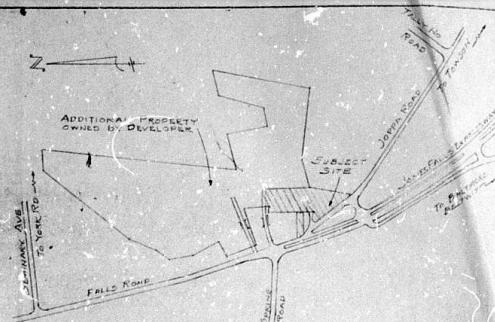


- GENERAL NOTE**
1. AREA OF PROPERTY EQUALS 1.5104 ACRES
 2. AREA OF SITE REQUESTING PARKING PERMIT EQUALS 1.5104 ACRES
 3. EXISTING ZONING OF PROPERTY BR-CR, RC-5, OR 2 & RC-5
 4. EXISTING USE OF PROPERTY RESIDENTIAL / VACANT LAND
 5. PROPOSED ZONING OF PROPERTY BR-CR (OR 2 & RC-5 WITH PARKING PERMIT)
 6. PROPOSED USE OF PROPERTY "RETAIL SHOP" / "OFFICE USE"
 7. OFF-STREET PARKING DATA:
 A. PROPOSED PARKING 1000 S.F.T. REQUIRING 11 SPACES (1/2000")
 B. PROPOSED RETAIL AREA 14,745 S.F.T. REQUIRING 74 SPACES (1/2000")
 C. PROPOSED MALL AREA 1374 S.F.T. REQUIRING 10 SPACES (1/2000")
 D. PROPOSED OFFICE AREA 24,715 S.F.T. REQUIRING 100 SPACES (1/2000")
 E. TOTAL SPACES REQUIRED 1100
 F. TOTAL SPACES PROPOSED 240
 8. EXISTING RESIDENTIAL DWELLING TO BE REMOVED
 9. SITE IS LOCATED IN JONES FALLS DRAINAGE AREA

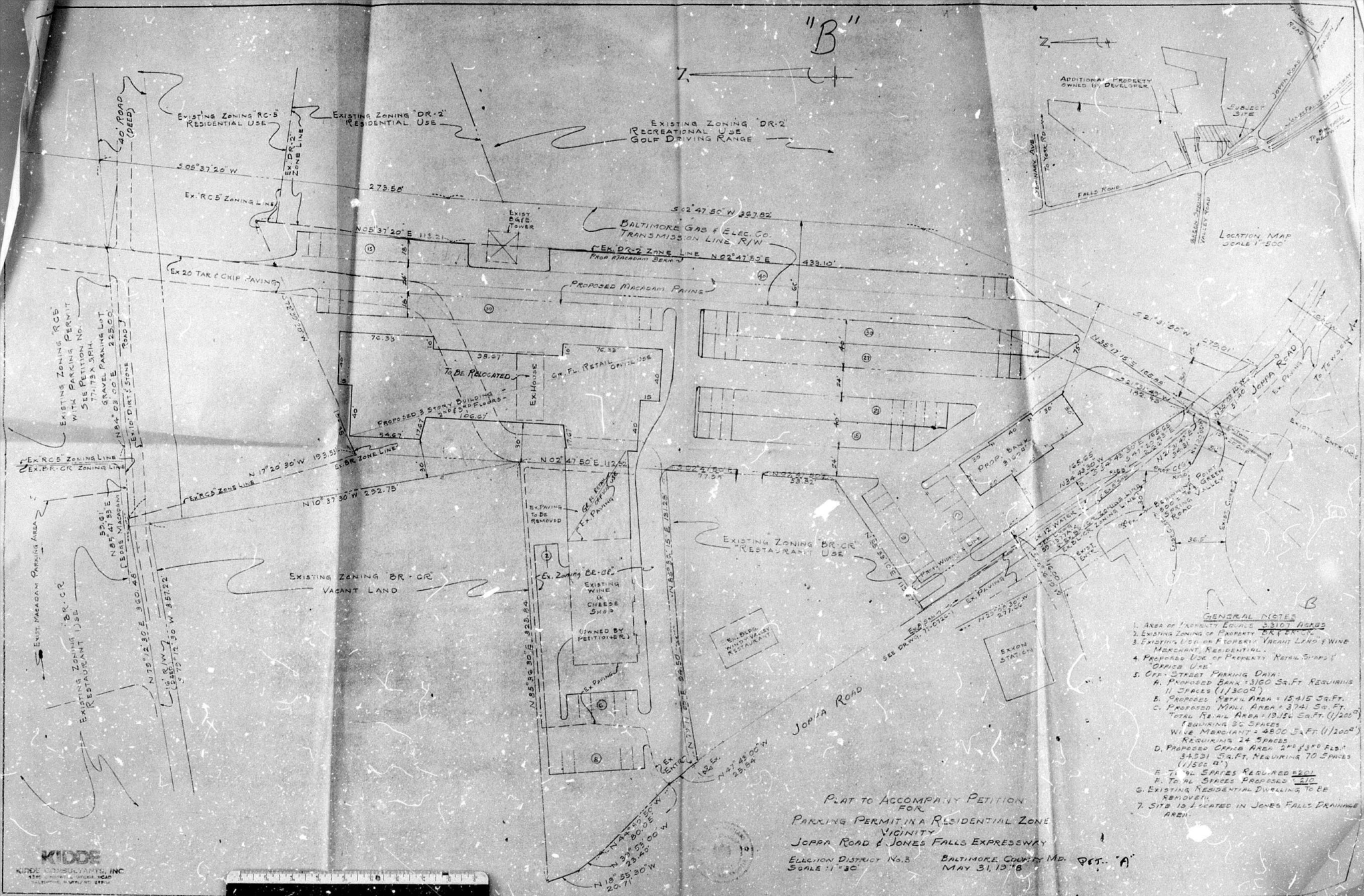
PLAT TO ACCOMPANY PETITION
 PARKING PERMIT IN A RESIDENTIAL ZONE
 VICINITY
 JOPPA ROAD & JONES FALLS EXPRESSWAY
 ELECTION DISTRICT No. 3 BALTIMORE COUNTY, MD.
 SCALE 1"=30' FEBRUARY 6, 1976

KIDDE
 KIDDE CONSULTANTS, INC.
 1800 F STREET, BALTIMORE, MD 21201
 TEL: 336-1100





LOCATION MAP
SCALE 1"=500'



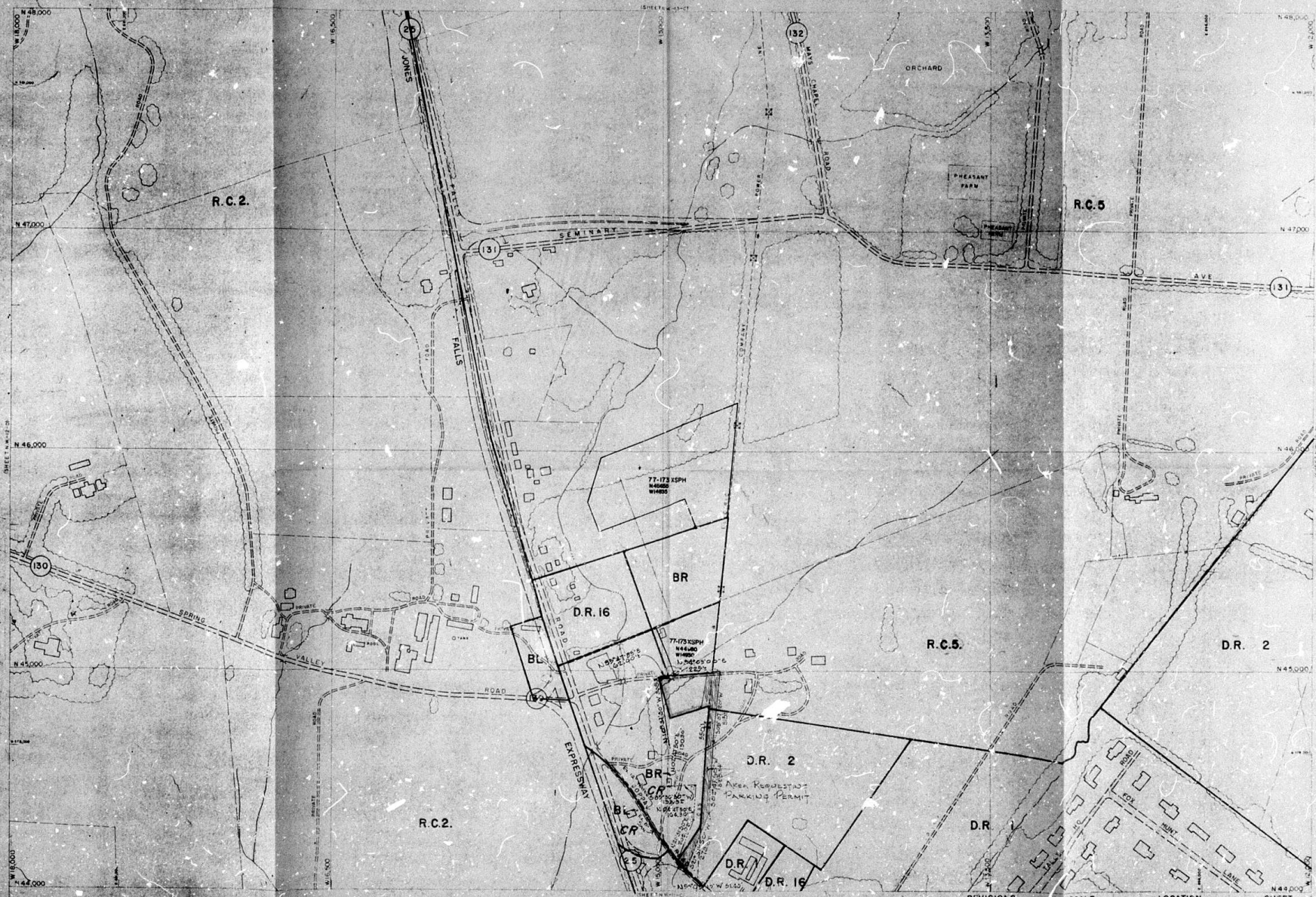
GENERAL NOTES:

- GENERAL NOTES
- AREA OF "NEW" LOT IS 13100 SQ.FT.
 - EXISTING ZONING OF PROPERTY IS RESIDENTIAL.
 - EXISTING USE OF PROPERTY: VACANT LAND & WINE MERCHANT, RESIDENTIAL.
 - PROPOSED USE OF PROPERTY: RETAIL STORES & OFFICE USE.
 - EXISTING STREET PARKING DATA:
 - PROPOSED BRANX 13100 SQ.FT. REQUIRING 11 SPACES (1/3600')
 - PROPOSED RETAIL AREA = 15415 SQ.FT. PROPOSED MAIL AREA = 3741 SQ. FT. TOTAL RETAIL AREA = 19156 SQ.FT. (1/200') REQUIRING 28 SPACES WINE MERCHANT = 4200 SQ.FT. (1/2000') REQUIRING 24 SPACES
 - PROPOSED GARAGE AREA 20150 SQ. FT. 34510 SQ.FT. REQUIRING 70 SPACES (1/3500')
 - TOTAL SPACES REQUIRED 8901
 - TOTAL SPACES PROVIDED 510
 - EXISTING RESIDENTIAL DRIVING TO BE REMOVED.
 - STREET LOCATED IN JONES FALLS DRAINAGE AREA.

PLAT TO ACCOMPANY PETITION
FOR
PARKING PERMIT IN A RESIDENTIAL ZONE
VICINITY
JOPPA ROAD & JONES FALLS EXPRESSWAY

ELECTION DISTRICT No. 3 BALTIMORE COUNTY MD. DET. "A"
SCALE: 1"=30' MAY 31, 1978

SEP 17 1981

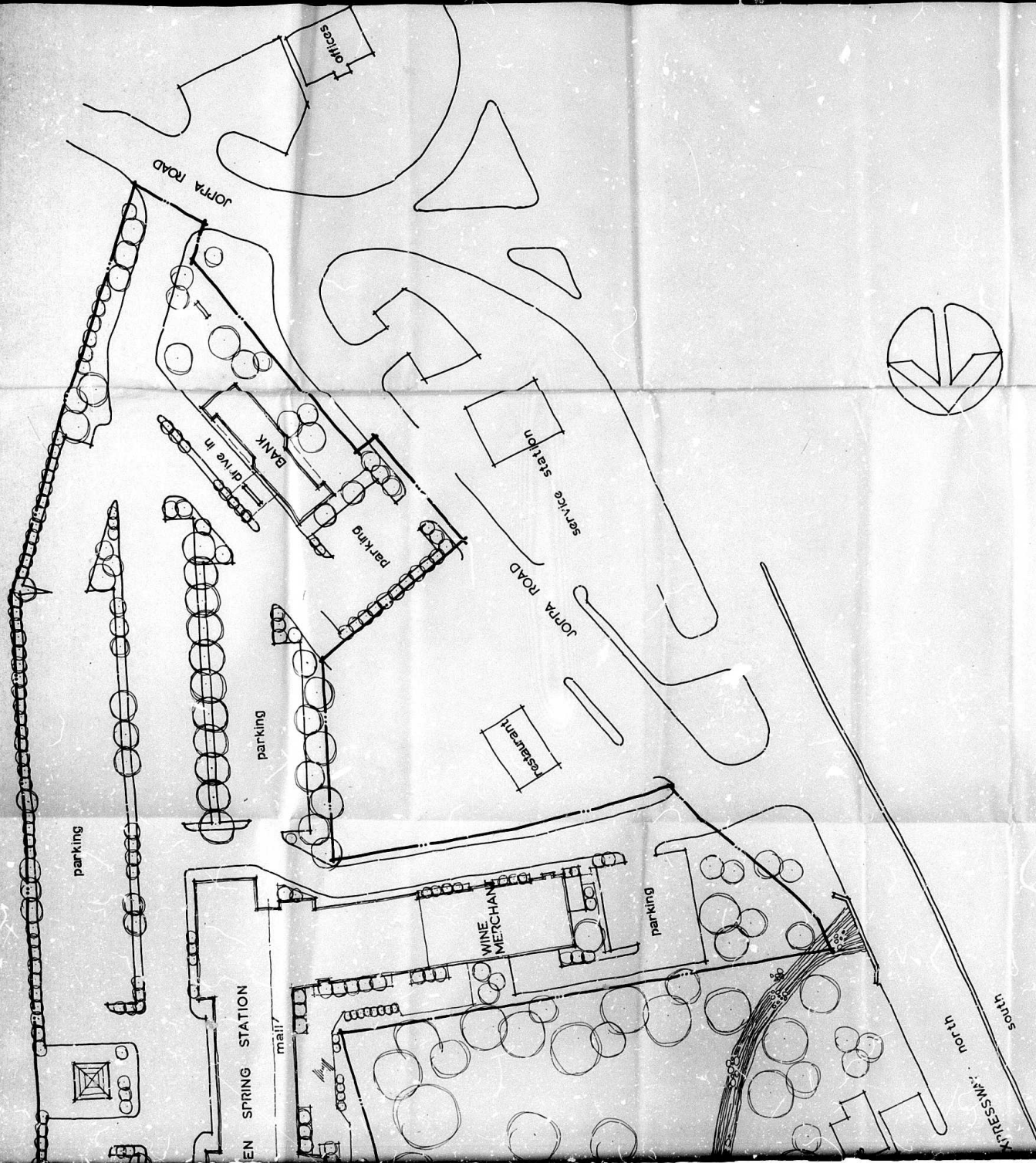


8-SW S-SE

CITY OF BALTIMORE
BALTIMORE COUNTY COMMISSION
JULY 1976 & OCT. 8, 1976
110-76, 111-76, 112-76, 113-76, and 114-76
BALTIMORE COUNTY COUNCIL

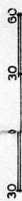
PHOTOGRAMMETRIC MAP OF BALTIMORE COUNTY METROPOLITAN AREA

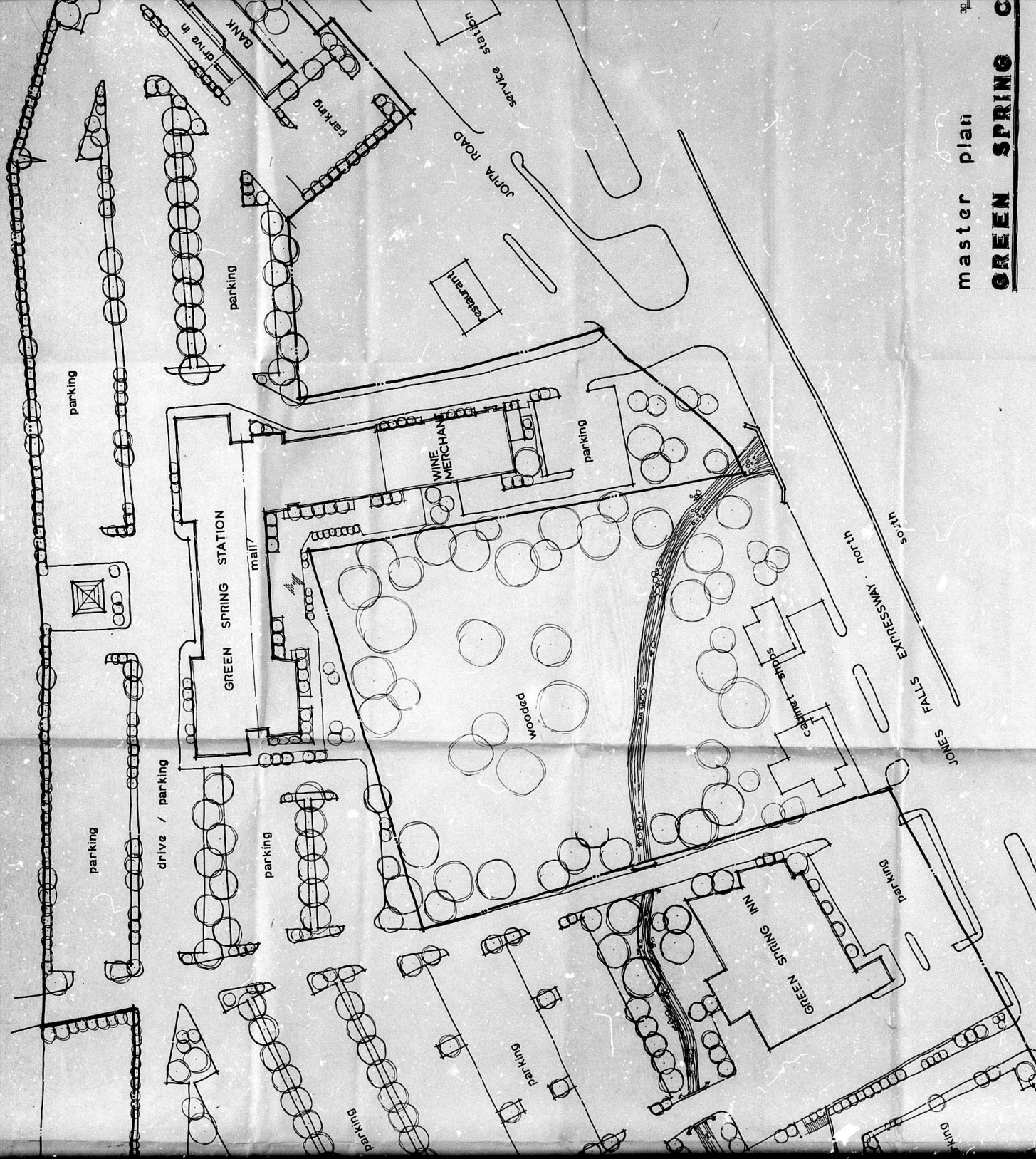
REVISIONS			SCALE	LOCATION	SHEET
BY	DATE	MAPS INC.			
Planimetric	4-11-70	INC.	1" = 200'	BROOKLANDVILLE	N.W. 12-C
DATE OF PHOTOGRAPHY			APRIL 1965		
DRAWN BY			METROGRAPHIC, BALTIMORE, MD.		



master plan
GREEN SPRING COMPLEX

VALLEY CENTER
 IANNIELLO, HOFMANN and ASSOC., INC.
 DEVELOPERS
 ARCHITECTS





master plan

GREEN SPRING C

VALLEY CENTER
IANNELLO, HOFMANN and ASSOC., INC.

balto. gas and elect. co. - power lines

parking

drive / parking

platform
tennis

GREEN SPRING
RACQUET CLUB

GREEN SPRING
INN

parking

GREEN SPRING VILLAGE OFF. BLDG.

parking

parking

parking

parking

balto. c

GREEN SPRING RACQUET CLUB

parking

tennis courts and pool area

